PUBLIC DISCLOSURE

April 6, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Opportunity Bank of Montana
1400 Prospect Avenue
Helena, Montana 59601
RSSD 685676

Federal Reserve Bank of Minneapolis
90 Hennepin Avenue, P.O. Box 291
Minneapolis, Minnesota 55480-0291

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Definitions for many of the terms used in the public evaluation can be found in section 228.12 of Regulation BB. For additional convenience, a Glossary of Common CRA Terms is attached as Appendix C at the end of this public evaluation.

ABBREVIATIONS

The following abbreviations may be used throughout this performance evaluation:

Assessment Area	AA
Automated Teller Machine	ATM
U.S. Bureau of Labor Statistics	BLS
Community Development	CD
Community Reinvestment Act	CRA
Dun & Bradstreet	D&B
Federal Deposit Insurance Corporation	FDIC
Federal Financial Institutions Examination Council	FFIEC
Federal Housing Administration	FHA
Federal Home Loan Bank	FHLB
U.S. Department of Agriculture Farm Service Agency	FSA
Home Mortgage Disclosure Act	HMDA
U.S. Department of Housing and Urban Development	HUD
Interactive Teller Machine	ITM
Low-Income Housing Tax Credit	LIHTC
Low- and Moderate-Income	LMI
Montana Board of Housing	MBOH
Metropolitan Statistical Area	MSA
U.S. Small Business Administration	SBA
U.S. Department of Agriculture	USDA
Department of Veterans Affairs	VA

INSTITUTION RATING

INSTITUTION'S CRA RATING: Opportunity Bank of Montana's rating is Outstanding.

Examiners evaluated the bank's CRA performance using the Large Bank CRA Examination Procedures. The following table shows the CRA performance of Opportunity Bank of Montana, Helena, Montana, with respect to the Lending, Investment, and Service Tests.

Opportunity Bank of Montana Performance Tests			
Performance Levels	***Lending Test****	***Investment Test***	***Service Test***
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
*Examiners assigned more weight to the Lending Test than to the Investment and Service Tests for determining the overall rating, in accordance with the Large Bank CRA Examination Procedures.			

Major factors supporting the institution's rating include the following:

Lending Test
- Lending activity shows excellent responsiveness to credit needs throughout its AAs.
- Overall, the distribution of loans reflects good dispersion among borrowers of different income levels and businesses and farms of different sizes.
- Overall, the geographic distribution of loans throughout the AAs is good.
- The bank is a leader in making CD loans.
- The bank originated a substantial majority of its loans within its AAs.
- The bank makes extensive use of innovative and/or flexible lending practices in serving AA credit needs, which enhances the bank's performance under the Lending Test.

Investment Test
- The overall level of qualified investments, including donations, is excellent.
- The bank's qualified investments exhibit excellent responsiveness to local credit and CD needs.

Service Test
- The bank provides an overall relatively high level of CD services.
- Retail banking services are readily accessible to the bank's geographies and individuals of different income levels in its AAs.
- Services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- Overall, changes in the bank's network of branches, drive-up facilities, and ATMs did not adversely affect the accessibility of the bank's products and services.

INSTITUTION

DESCRIPTION OF INSTITUTION

General. Opportunity Bank of Montana is an intrastate bank headquartered in Helena, Montana, with assets of $2.1 billion as of March 31, 2026. The bank continues to be effective in meeting the credit and CD needs of the residents, businesses, and farms throughout its AAs. No financial constraints or legal impediments prevent the bank from serving the credit needs of its AAs. At the previous evaluation dated October 24, 2022, the bank's CRA rating was Outstanding, under the Intermediate Small Bank CRA Examination Procedures.

Structure. Opportunity Bank of Montana is wholly owned by Eagle Bancorp Montana, Inc., Helena, Montana, a publicly traded company. The holding company also owns Eagle Bancorp Statutory Trust I and Opportunity Financial Services, both headquartered in Helena. The bank owns Opportunity Housing Fund LLC (OHF LLC) in Helena.

Loan Portfolio. As of March 31, 2026, the bank's loan portfolio totaled $1.5 billion. The portfolio consisted of 62.1% commercial, 18.3% agriculture, 10.9% residential real estate, 6.5% consumer open-end, 1.4% consumer closed-end, and 0.8% other loans. Total assets increased by 11.5% and total loans increased by 20.6% since June 30, 2022; growth has been organic but also impacted by branch openings and closings.

Credit Products. The bank is primarily a commercial and agricultural lender but also offers other traditional credit products, including residential real estate and consumer loans, to serve the needs of its AAs. In addition, the bank participates in a variety of loan programs noted in the Innovative and Flexible Lending Practices section of this report.

Offices. The bank operates its main office and 29 full-service branches in Montana. In April 2022, the bank completed its acquisition of First Community Bank, Glasgow, Montana, and its seven Montana branches in Ashland, Culbertson, Froid, Glasgow, Helena, Hinsdale, and Three Forks, resulting in a new bank presence in Valley County.[1] The bank also opened two de novo branches and closed two branches during the evaluation period. Most offices have ATMs and drive-through services. The bank also operates stand-alone ATMs in its AAs.

Assessment Areas. During the evaluation period, the bank's AAs changed significantly. For 2022 and 2023, the bank had seven AAs: Non-MSA, Billings MSA, Fergus County, Great Falls MSA, Missoula MSA, Rosebud County, and Northeast Non-MSA. The Non-MSA AA included Broadwater, Deer Lodge, Gallatin, Jefferson, Lewis and Clark, Madison, Park, Ravalli, Silver Bow, Sweet Grass, and Teton counties. The Northeast Non-MSA consisted of Roosevelt and Valley counties. Prior to the First Community Bank acquisition, Roosevelt County was its own AA.

For 2024, Gallatin County was delineated as the Bozeman MSA and Broadwater, Jefferson, and Lewis and Clark counties were delineated as the Helena MSA, requiring the bank to evaluate its existing AAs. As such, for 2024 and 2025, the bank had 11 AAs, which are listed in the table below. The Bozeman MSA and Helena MSA each became separate AAs. Additionally, three counties in the 2022 and 2023 Non-MSA AA were removed from the AA and designated as two new AAs; specifically, the bank

[1] Given the timing of the acquisition, examiners did not evaluate Valley County as part of an AA during the previous evaluation.

defined Teton County as its own AA and Park and Sweet Grass counties as the Southcentral Non-MSA AA. The bank still maintains a Non-MSA AA, but the AA now consists of four counties rather than 11.

The bank's 2025 AAs and counties comprising the AAs are shown in the table below. Additional details, including changes to the AAs and information about the retail delivery network during the evaluation period, are in the applicable AA sections of this evaluation.

AA Information as of 2025		
AA Name	***Locations of Offices by City/Town[2]***	***Counties Comprising AA***
Billings MSA	Billings (3)	Carbon Stillwater Yellowstone
Bozeman MSA	Bozeman (2) Three Forks	Gallatin
Fergus	Denton Winifred	Fergus
Great Falls MSA	Great Falls	Cascade
Helena MSA	Helena (4) Townsend	Broadwater Jefferson Lewis and Clark
Missoula MSA	Missoula (2)	Mineral Missoula
Non-MSA	Butte Hamilton Sheridan Twin Bridges	Deer Lodge Madison Ravalli Silver Bow
Northeast Non-MSA	Culbertson Froid Glasgow Hinsdale Wolf Point	Roosevelt Valley
Rosebud	Ashland	Rosebud
Southcentral Non-MSA	Big Timber Livingston	Park Sweet Grass
Teton County	Choteau Dutton	Teton

SCOPE OF EVALUATION

Examiners followed the FFIEC's *Interagency Examination Procedures for Large Institutions* to determine the scope of the evaluation and to analyze the bank's CRA performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy, market competition, demographic data, economic characteristics, credit demand, and CD opportunities, obtained through data sources as well as interviews with bank management and community contacts. The contacts did not identify any unmet credit needs in the bank's AAs.

[2] Unless noted, the bank has one location in the listed city/town.

Examiners selected the three following AAs for full-scope reviews: Billings MSA, Helena MSA, and Northeast Non-MSA. These AAs represent 45.1% of the bank's loans originated inside the AAs by number and 35.7% by dollar amount, according to 2024 HMDA- and CRA-reportable loan data. The other AAs received limited-scope reviews.

In determining the overall CRA rating, examiners placed equal weight on the three full-scope AAs, as the loan volumes in these AAs were generally comparable. Based on 2024 HMDA- and CRA-reportable loans, the bank made, by number, 14.1% of its loans in the Billings MSA, 14.5% in the Helena MSA, and 16.4% in the Northeast Non-MSA, and by dollar amount, 12.4%, 13.9%, and 9.3% in those AAs, respectively.

To understand the bank's CRA performance, examiners evaluated the following data:

- The bank's reported 2022, 2023, and 2024 HMDA loans, as well as 2024 small business and small farm loans.[3]
- The bank's CD loans, qualified investments (including donations), and CD services, as well as retail banking services and innovative and flexible lending practices from October 24, 2022, through December 31, 2025.

Examiners placed an emphasis on the bank's HMDA and CRA lending performance in comparison to that of aggregate lenders with reported loans in the AAs in the respective years, as aggregate lending data is an indicator of credit demand. Demographic data was also considered in the analysis to help understand the performance context in the bank's various AAs. For each AA, examiners generally used the total volume of loans in the AA for the timeframe reviewed to determine the weighting of the loan products.

To evaluate the bank's lending test performance, examiners generally placed the greatest weight on borrower distribution, geographic distribution, and CD lending. The remaining criteria were weighted equally. Further, examiners generally assigned less weight to the geographic distribution of loans in an AA if the AA did not include LMI census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This evaluation discusses the bank's overall CRA performance, as well as detailed discussions of the bank's lending, investment, and service activities in each full-scope AA. Conclusions and data for the limited-scope AAs are included in the limited-scope sections of the evaluation and Appendix D.

LENDING TEST

The bank's Lending Test rating is Outstanding. This conclusion is primarily derived from outstanding Lending Test performance in the bank's Montana full-scope AAs.

Examiners analyzed the following criteria to determine the Lending Test rating:

- Lending activity
- Lending to borrowers of different income levels and to businesses and farms of different sizes
- Geographic distribution of loans

[3] Not all products were reviewed in each AA. See the specific AA sections for a list of products reviewed. Examiners reviewed 2022 HMDA data for consistency with the bank's 2023 and 2024 performance; the report does not include a detailed discussion of 2022 HMDA data. Aggregate lending data was only used for comparison to 2024 CRA-reportable loans as this is when the bank became a large bank for CRA purposes.

- Lending inside the bank's AAs
- CD lending
- Use of innovative and/or flexible lending practices

Examiners evaluated the overall lending activity and the concentration of lending inside the AAs at the institution level; both criteria are discussed below. For a detailed discussion of other Lending Test criteria, see the individual AA sections of this evaluation.

Lending Activity

The bank's lending activity demonstrates excellent responsiveness to the credit needs of the AAs. The Summary of Lending Activity table shows the bank's HMDA-reportable lending activity for 2022, 2023, and 2024, as well as CRA-reportable lending activity for 2024, by number and dollar amount.

Summary of Lending Activity				
Loan Type	**#**	**%**	**$(000s)**	**%**
Home Purchase – Conventional	2,364	51.1%	755,130	59.5%
Home Purchase – FHA	447	9.7%	133,384	10.5%
Home Purchase – VA	266	5.7%	100,963	8.0%
Home Improvement	677	14.6%	55,799	4.4%
Multi-Family Housing	48	1.0%	66,614	5.3%
Other Purpose Closed-End	54	1.2%	6,418	0.5%
Refinancing	552	11.9%	128,427	10.1%
Loan Purpose Not Applicable	1	0.0%	113	0.0%
Other Purpose LOC	220	4.8%	21,400	1.7%
Total HMDA-related	**4,629**	84.5%	**1,268,248**	90.8%
Total Small Business-related	**453**	8.3%	**74,983**	5.4%
Total Small Farm-related	**396**	7.2%	**54,120**	3.9%
TOTAL LOANS	**5,478**	**100.0%**	**1,397,351**	**100.0%**

The bank's primary business lines are mortgage, small business, and small farm lending. Loan volume and primary business lines vary by AA. In rural areas, small farm lending is a predominant loan type, while the bank is an active small business and HMDA lender in other markets. Overall, the bank's lending activities show excellent responsiveness to local credit needs in Montana. For detailed information regarding lending activity, see each full-scope AA section. The bank is a leading lender in several AAs, including the full-scope AAs.

Assessment Area Concentration

The bank extended a substantial majority of its loans inside its AAs. The table below shows the bank's concentrations of lending inside and outside the AAs for 2022, 2023, and 2024 HMDA loans and for 2024 CRA-reportable loans.

Lending Inside and Outside the AAs

Loan Type	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase – Conventional	2,364	92.7%	755,130	92.7%	189	7.4%	59,177	7.3%
Home Purchase – FHA	447	92.5%	133,384	94.2%	36	7.5%	8,166	5.8%
Home Purchase – VA	266	93.3%	100,963	93.7%	19	6.7%	6,756	6.3%
Home Improvement	677	96.6%	55,799	96.6%	24	3.4%	1,941	3.4%
Multi-Family Housing	48	84.2%	66,614	92.0%	9	15.8%	5,809	8.0%
Other Purpose Closed-End	54	90.0%	6,418	88.6%	6	10.0%	826	11.4%
Refinancing	552	95.2%	128,427	94.2%	28	4.8%	7,955	5.8%
Loan Purpose Not Applicable	1	100.0%	113	100.0%	0	0.0%	0	0.0%
Other Purpose LOC	220	97.3%	21,400	97.7%	6	2.7%	507	2.3%
Total HMDA-related	**4,629**	**93.6%**	**1,268,248**	**93.3%**	**317**	**6.4%**	**91,137**	**6.7%**
Total Small Business-related	**453**	**94.4%**	**74,983**	**95.1%**	**27**	**5.6%**	**3,885**	**4.9%**
Total Small Farm-related	**396**	**71.9%**	**54,120**	**71.2%**	**155**	**28.1%**	**21,944**	**28.8%**
TOTAL LOANS	**5,478**	**91.7%**	**1,397,351**	**92.3%**	**499**	**8.3%**	**116,966**	**7.7%**

The bank extended 91.7% of all loans by number and 92.3% by dollar amount within its AAs. The bank's HMDA and small business lending inside the AAs exceeded the bank's small farm lending inside the AAs. The lower percentage of small farm lending inside the AAs generally reflects the geographic nature of agricultural lending, which often includes borrower relationships that extend into broader, rural areas.

Borrowers and Geographic Distribution of Loans

Overall, the bank's distribution of loans among small businesses, small farms, and LMI borrowers is good. Geographically, the bank's distribution and dispersion of loans in LMI census tracts is good. The bank's lending patterns do not reveal any unexplained gaps in any of the AAs.

Innovative and Flexible Lending Practices

The bank makes extensive use of innovative and/or flexible lending programs in serving AA credit needs, which enhances the bank's Lending Test rating. Over the evaluation period, the bank engaged in 1,388 flexible lending activities totaling $351.2 million. The bank's participation in small business and small farm programs includes 39 loans for $16.2 million. The bank's participation in mortgage programs includes 1,349 loans for $335.0 million.

The bank offers traditional, industry-recognized guaranteed and insured loan programs, including SBA 7(a), SBA 504 Certified Development Company, SBA Express, USDA FSA, and USDA Business and Industry for small business borrowers, and FSA, VA, and USDA for mortgage borrowers. During the evaluation period, the bank originated 26 loans totaling $11.4 million to small businesses through the guaranteed and insured programs. Additionally, the bank originated 720 loans totaling $231.7 million to consumers through the guaranteed and insured programs.

The bank also participated in the following mortgage down payment and/or closing cost assistance programs:

- MBOH Bond Advantage,
- MBOH Plus,
- FHLB Home$tart,
- FHLB Native American Homeownership Initiative,
- CBC Mortgage Agency's Chenoa Fund, and
- Programs available through NeighborWorks Montana and NeighborWorks Great Falls.

All down payment and/or closing cost programs except the Chenoa Fund have income-eligibility requirements. With these programs, 223 homebuyers collectively received approximately $4.9 million to help achieve their homebuying goals.

Lastly, the bank originated loans through other innovative and/or flexible small business, real estate, and consumer loan programs that feature varying characteristics. The mortgage-related programs, with 406 loans totaling $98.4 million, include key attributes such as eligibility for low-income borrowers and first-time homebuyers, advantageous interest rates, deferred payments, no or low downpayment requirements, and funds for repairs and renovations. The small-business related program, with 13 loans totaling $4.8 million, assists new Montana businesses entering the market and helps existing Montana businesses use additional borrowings to stabilize, pivot, expand, or restart. The above-mentioned programs are identified in the following list:

- City of Billings First-Time Homebuyer,
- MBOH (including conventional, VA, FHA, USDA, Veterans' Home Loan, Community Land Trust, and Habitat for Humanity),
- Fannie Mae HomeStyle Renovation,
- Fannie Mae HomeReady,
- FHLB of Des Moines Mortgage Rate Relief, and
- Montana State Small Business Credit Initiative 2.0 Loan Participation.

Community Development Lending

The bank is a leader in making CD loans. The bank originated 29 CD loans totaling $78.5 million during the evaluation period that benefit its AAs or broader statewide and regional Montana areas. The following table shows the bank's CD loans, by number and dollar volume, during the evaluation period by AA and broader statewide or regional areas including the bank's AAs.

Community Development Loans by AA and Broader Statewide or Regional Areas		
AA	**#**	***$***
Billings MSA	3	8,861,250
Bozeman MSA	5	8,904,654
Great Falls MSA	4	4,772,777
Helena MSA	4	1,430,459
Non-MSA AA	8	47,176,122
Northeast Non-MSA	1	308,334
Southcentral Non-MSA	1	1,050,000
Statewide MT	3	6,000,000
Total	**29**	**78,503,596**

The bank's CD lending activity in the full-scope AAs represents 27.6% of the total CD lending by number and 13.5% by dollar. CD lending in the limited-scope AAs and broader statewide areas, including the bank's AAs, represents 72.4% of total CD lending by number and 86.5% by dollar. Of the CD loans in the full-scope AAs, the bank made two impactful economic development purpose loans totaling over $8.8 million in the Billings AA that financed small business operations and expansion, including the creation of more than 40 new jobs. In addition, four other loans, totaling $1.8 million in the full-scope AAs, financed affordable housing properties. Affordable housing is a critical need across the state of Montana.

The bank's overall CD lending performance is strengthened by significant CD lending activity in its limited-scope AAs and in statewide areas including the bank's AAs. The Non-MSA AA accounts for the largest dollar volume ($47.2 million, representing 58.4% of total CD lending), and the Bozeman MSA and Great Falls MSA also have meaningful CD lending activity. Of these additional loans, the bank made the following impactful community development loans in the limited-scope AAs:

- Economic development purpose loans totaling $45.5 million, resulting in the creation of numerous new jobs,
- Affordable housing purpose loans in the amount of $7.9 million to finance multi-family LMI housing units, including LIHTC-related projects,
- Loans totaling $11.5 million that finance operational needs of organizations primarily serving the needs of LMI residents, including residents who are homeless or in need of transitional or workforce housing, in the AAs and across the state, and
- A loan in the amount of $3.0 million that finances the expansion of medical facilities, resulting in the provision of new medical services, in an underserved, rural area.

The bank's level of CD lending is strong relative to its asset size, and in light of significant competition for CD loans and the limited qualified lending opportunities in certain areas, particularly rural areas.

Because the bank was responsive in meeting the credit and CD needs of its AAs, examiners also considered two affordable housing-purpose CD loans totaling $2.4 million that benefited areas in Montana outside of the bank's AAs. The table above does not include these loans.

INVESTMENT TEST

The Investment Test rating is Outstanding. The bank has an excellent overall level of qualified investments, including donations, and exhibits excellent responsiveness to credit and CD needs. During the evaluation period, the bank's qualified investments totaled approximately $15.6 million in non-donation investments and $989,950 in donations, benefiting the bank's AAs and broader statewide and regional areas that include the AAs.

Investments (non-donation). The bank made an excellent level of qualified investments in securities. The following table shows the total volumes of investments (new and prior period) by AA and broader statewide or regional areas including the bank's AAs.

Qualified Investments by AA and Statewide Areas				
	Prior Period Investments		*New Investments*	
AA	#	$	#	$
Non-MSA AA[4]	2	8,979,158	1	500,000
Statewide Montana	4	1,098,280	1	5,000,000
Total	**6**	**$10,077,438[5]**	**2**	**$5,500,000**

The bank made two new security investments totaling $5.5 million during the evaluation period and continued to hold six prior-period investments totaling $10.1 million. All investments support affordable housing in Montana, including down payment assistance programs and LIHTC projects.

The bank's two new investments for $5.5 million support affordable housing needs in the Non-MSA AA, as well as in numerous counties across the state of Montana, including counties in the bank's AAs. The bank also held prior-period investments for $10.1 million that supported affordable housing in the bank's Non-MSA AA and Bozeman MSA AA, as well as in broader statewide areas including the bank's AAs. The bank does not have AA-specific investments in the Billings MSA, Helena MSA, or Northeast Non-MSA AAs, which reflects the competitive environment for CD investment opportunities in Montana and the bank's strategy of making statewide investments that provide CD benefits across its AAs. Bank management noted that qualified CD investment opportunities in Montana are highly competitive and often fully subscribed quickly, limiting availability of AA-specific opportunities.

The bank makes extensive use of innovative and complex investments to support CD initiatives. The bank's subsidiary, OHF LLC, provides equity in LIHTC projects as an investor limited partner to help support creation and retention of affordable housing units in its AAs. Two of the bank's prior-period investments, totaling approximately $9.9 million, fund LIHTC projects. The bank also invests in equity equivalent investments through partnerships with CD financial institutions, supporting affordable housing initiatives. During the evaluation period, the bank had approximately $6.2 million in equity equivalent investments; $5.5 million of that amount represents two new investments made since the previous evaluation. The level of investments, combined with the extensive use of innovative and complex products, shows excellent responsiveness to CD needs in the AAs, particularly for affordable housing.

Donations. The bank made an excellent level of qualified investments in the form of donations that directly benefited the bank's AAs and broader statewide, regional, or multistate areas that include the bank's AAs. These donations totaled approximately $989,950, as shown in the table below. This dollar volume of donations represents more than a threefold increase from the dollar volume of donations during the previous evaluation period, demonstrating excellent commitment to supporting CD throughout the bank's footprint and in broader areas that include the bank's AAs.

[4] The new investment, made in 2023, benefited Gallatin County (delineated as the Bozeman MSA AA in 2024), which was in the Non-MSA AA at that time. Of the prior-period investments, one investment for $5,873,580 benefited Gallatin County (Non-MSA AA) through 2023; for 2024 and 2025, the investment benefited the Bozeman MSA AA.
[5] This figure includes any investments that matured, were sold, or paid during the evaluation period.

Qualified Investment Donations Benefiting AAs and Broader Regional, Statewide, or Multistate Areas		
Purpose	#	$
Affordable Housing	21	30,362
Community Services	312	911,311
Economic Development	27	35,380
Revitalize or Stabilize	8	13,200
Total	**368**	**989,953**

Donations primarily focused on community services to LMI individuals and families. Bank donations also supported affordable housing, economic development, and efforts to revitalize or stabilize qualified geographies. The bank distributed donations across its 11 AAs, including all three full-scope AAs, its limited-scope AAs, as well various broader statewide, regional, or multistate areas including the bank's AAs.

Notable statewide donations included over $300,000 from the bank's Interest on Lawyers' Trust Accounts program to an organization that funds the provision of essential legal services for low-income individuals throughout Montana. In addition, the bank donated approximately $190,000 to other statewide- or regional-focused organizations (for example healthcare systems that provide care or resources in underserved areas or to LMI individuals); some of this money notably impacts certain AAs and is significant to the overall investment test conclusion. The bank's charitable contributions show excellent responsiveness to CD needs. Additional details are presented in the analysis of each full-scope AA.

SERVICE TEST

The bank's Service Test rating is High Satisfactory. This conclusion is primarily derived from the bank's performance in the full-scope AAs.

Retail Banking Services

Delivery systems are readily accessible throughout its AAs, and services do not vary in a way that inconveniences LMI areas or individuals. The bank provides retail services through its network of branches, drive-up facilities, ITMs, and ATMs, as well as other alternative delivery systems, such as telephone banking, online banking, and mobile banking. The table below shows the distribution of banking offices by income level of geographies, as well as the number of branch openings and closings during the evaluation period.

Geographic Distribution of Branches
All AAs

Tract Income Levels		BRANCHES							DEMOGRAPHICS			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	2	1.0%	0.8%	0.8%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	**Total**	**8**	**26.7%**	**0**	**1**	**8**	**0**	**1**	37	18.5%	16.6%	18.1%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	**Total**	**17**	**56.7%**	**0**	**1**	**15**	**0**	**1**	125	62.5%	62.7%	60.7%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	**Total**	**4**	**13.3%**	**0**	**0**	**1**	**0**	**0**	34	17.0%	19.3%	19.7%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**1**	**3.3%**	**1**	**0**	**1**	**0**	**0**	2	1.0%	0.5%	0.6%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**30**	**100.0%**	**1**	**2**	**25**	**0**	**2**	200	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

The bank's distribution of its offices is reasonably aligned with the percentage of the various census tracts in the AAs. Notably, the percentage of branches in moderate-income tracts exceeds the percentage of moderate-income tracts. Also, several of the bank's branches, although not located in LMI tracts, are in close proximity to such tracts.

Overall, the bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems. Since the previous evaluation, the bank closed two branches (Bozeman Mendenhall in December 2023 and Missoula Downtown in December 2023); in both cases, existing customers were directed to nearby branches for banking services. In addition, the bank opened one branch in Missoula (February 2025) located approximately two miles from the previously closed branch. Lastly, the bank's 2022 acquisition improved accessibility in the Northeast Non-MSA AA.

Hours of operation are reasonable and generally consistent across the bank's markets. The bank offers typical weekday hours that may vary slightly depending on location. The bank operates drive-up facilities at most branches and operates numerous ATM locations, including full-service and cash-dispensing ATMs, enhancing accessibility to customers across its rural service areas. The bank also utilizes ITMs at two locations (Winifred and Billings Heights).

Additional details about the bank's retail banking operations were included in the Description of Institution and Scope of Evaluation sections above. More detailed information about the bank's retail banking operations and CD service test performance is in the respective analysis of each full-scope AA.

Community Development Services

The bank provides a relatively high level of CD services, reflective of a relatively high level of services in the Northeast Non-MSA AA and Helena MSA AA and an adequate level of services in the Billings MSA AA. Overall, bank employees provided 119 services that benefited the bank's AAs. Bank employees also provided 21 services that benefited broader regional, statewide, or multistate areas that include the bank's AAs.

Bank officers and employees primarily helped organizations that provide community services to LMI individuals, but also supported organizations focused on affordable housing, economic development, and efforts to revitalize or stabilize qualified areas. Bank employees served in a variety of capacities, including board members, treasurers, committee members, and financial educators. The full-scope AA sections include more details about the bank's CD Service Test performance.

Community Development Services Benefiting AAs	
Purpose	**#**
Affordable Housing	8
Community Services	55
Economic Development	16
Revitalize or Stabilize	40
Total	**119**
Community Development Services with a Broader Regional or Statewide Benefit	
Purpose	**#**
Affordable Housing	10
Community Services	5
Economic Development	5
Revitalize or Stabilize	1
Total	**21**

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The examination did not reveal any evidence of violations of antidiscrimination laws or regulations (including Regulation B – Equal Credit Opportunity Act, Regulation C – Home Mortgage Disclosure Act, and the Fair Housing Act) or other illegal credit practices inconsistent with the bank helping to meet community credit needs. Neither the bank nor the Federal Reserve Bank of Minneapolis has received any CRA-related complaints.

NONMETROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTHEAST NON-MSA ASSESSMENT AREA

Bank Information. The bank operates five full-service branches in the Northeast Non-MSA AA in the following Montana communities: Hinsdale, Glasgow, Wolf Point, Froid, and Culbertson. Since the previous evaluation, the bank did not open or close any branches in the AA; however, an acquisition just prior to the previous evaluation added the Hinsdale, Glasgow, Froid, and Culbertson branches to the bank's retail operations. The five branches in this AA represent 16.7% of the bank's offices.

According to the June 30, 2025, FDIC Deposit Market Share Report, the bank had $355.3 million in deposits in the AA. The bank ranked first out of four financial institutions operating in the area, with 53.0% of the market's deposits. The bank's deposits in this AA represented 20.3% of its total deposits.

The bank faces significant competition in the AA for agricultural lending despite its dominant position among FDIC-insured institutions. Several non-bank competitors, such as specialized agricultural creditors not reflected in FDIC deposit data, also seek out loans in the AA despite the area having fewer traditional banks. In addition, a community bank opened a new branch in Wolf Point in 2023.

Assessment Area Information. For this evaluation period, the Northeast Non-MSA AA consists of Roosevelt and Valley counties. At the previous evaluation, the bank's AA only included Roosevelt County. In 2022, the bank's geographic footprint expanded to Valley County due to an acquisition. The AA now consists of six census tracts: two moderate-income and three middle-income tracts, as well as one upper-income tract. During the evaluation period, the three middle-income tracts in Valley County were classified as underserved. The AA also includes a large portion of the Fort Peck Reservation and small parcels of Turtle Mountain Indian Reservation land.

The table below provides demographic information for the Northeast Non-MSA AA based on 2024 FFIEC adjusted census data and 2024 D&B data.

2024 Northeast Non-MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0.0	0	0.0	0	0.0	1,044	25.7
Moderate	2	33.3	1,665	41.0	523	31.4	779	19.2
Middle	3	50.0	2,034	50.0	173	8.5	785	19.3
Upper	1	16.7	366	9.0	15	4.1	1,457	35.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**4,065**	**100.0**	**711**	**17.5**	**4,065**	**100.0**

2024 Northeast Non-MSA AA Demographics								
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,362	1,615	35.2	48.0	1,035	30.8	712	21.2
Middle	4,883	2,497	54.5	51.1	827	16.9	1,559	31.9
Upper	780	470	10.3	60.3	128	16.4	182	23.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**9,025**	**4,582**	**100.0**	**50.8**	**1,990**	**22.0**	**2,453**	**27.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	208	28.7	181	28.0	21	35.6	6	30.0
Middle	426	58.7	386	59.7	30	50.8	10	50.0
Upper	92	12.7	80	12.4	8	13.6	4	20.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**726**	**100.0**	**647**	**100.0**	**59**	**100.0**	**20**	**100.0**
Percentage of Total Businesses:				**89.1**		**8.1**		**2.8**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	58	27.2	56	26.5	2	100.0	0	0.0
Middle	119	55.9	119	56.4	0	0.0	0	0.0
Upper	36	16.9	36	17.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**213**	**100.0**	**211**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.1**		**0.9**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the nonmetropolitan areas of Montana for the year of loan origination. The table below shows the estimated incomes for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels
Northeast Non-MSA AA

FFIEC Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2022	**$81,600**	0	-	$40,799	$40,800	-	$65,279	$65,280	-	$97,919	$97,920	-	& above
2023	**$85,100**	0	-	$42,549	$42,550	-	$68,079	$68,080	-	$102,119	$102,120	-	& above
2024	**$80,300**	0	-	$40,149	$40,150	-	$64,239	$64,240	-	$96,359	$96,360	-	& above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC census-based median family income for nonmetropolitan areas of Montana, which was $70,967 for 2022 and 2023 and $64,515 for 2024.

Population. According to 2024 FFIEC adjusted census data, the total population of this rural AA is 18,372. Roosevelt County contains approximately 58.8% of the AA's population. The table below shows the population change in the AA, counties in the AA, nonmetropolitan areas of Montana, and the state of Montana. The slight decline in the AA contrasts with the nonmetropolitan Montana population growth of 4.1% and the statewide population growth of 6.9%.

Approximately 17.5% of families in the AA are below the poverty level, significantly higher than the statewide rate of 7.7%. Roosevelt County has the highest percentage of families below poverty, 26.5%, in the AA.

Northeast Non-MSA AA Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Northeast Non-MSA AA	18,649	18,372	-1.5%
Roosevelt County, MT	11,072	10,794	-2.5%
Valley County, MT	7,577	7,578	0.0%
Non-MSA Montana	465,283	484,395	4.1%
Montana	1,014,699	1,084,225	6.9%
Source: 2011-2015 U.S. Census Bureau American Community Survey *2020 U.S. Census Bureau Decennial Census*			

Housing Information. According to 2024 FFIEC adjusted census data, the AA has 9,025 housing units: 50.8% are owner occupied, 22.1% are rental units, and 27.2% are vacant. The vacancy rate in the AA is notably higher than the statewide vacancy rate of 15.3%. The median housing value is $123,951, which is considerably lower than the statewide median housing value of $244,900, consistent with the rural nature of the area. The affordability ratio for the AA is 38.6, compared to 24.0 for nonmetropolitan Montana and 23.1 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that housing is significantly more affordable in the AA than statewide. In this AA, the Fort Peck Housing Authority helps provide affordable rental housing for Native American families residing on the Fort Peck Reservation and uses a waitlist to help manage demand.

General Economic and Business Information. According to bank management, the local economy in the Northeast Non-MSA AA is stable with limited growth. The economy is heavily influenced by agriculture and limited housing supply. In addition to agriculture, primary industries include government, healthcare, and transportation. Major employers include tribal government, federal and state government entities, healthcare facilities (including critical access hospitals in Wolf Point and Glasgow), school districts, and a freight transportation company. Wages are stable. Agriculture products include durum wheat, lentils, yellow peas, chickpeas, and canola. Some ranchers also have cow/calf operations. The agriculture sector is facing some challenges, including increased input costs, decreased commodity prices, and insufficient rainfall.

As shown in the table below, the unemployment rate in the Northeast Non-MSA AA remained relatively stable throughout the evaluation period, ranging from 3.1% to 3.3%, slightly above the statewide rate. Roosevelt County's unemployment rate of 3.9% throughout the evaluation period was notably higher than Valley County's rates and state of Montana rates.

Northeast Non-MSA AA Unemployment Rates			
Area	**2022**	**2023**	**2024**
Northeast Non-MSA AA	3.3%	3.1%	3.2%
Roosevelt County, MT	3.9%	3.9%	3.9%
Valley County, MT	2.7%	2.4%	2.6%
Non-MSA Montana	3.0%	3.1%	3.3%
Montana	2.7%	2.7%	3.0%
Source: BLS, Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHEAST NON-MSA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in the Northeast Non-MSA AA is rated excellent. Examiners weighted small farm lending more than small business lending due to its significantly higher loan volume.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. For CRA-reportable lending in 2024, the bank ranked first with 50.5% market share among 33 lenders reporting CRA data. The bank is a lender for small loans and small business loans in this rural, agricultural AA. A community contact stated the bank is a significant participant in agricultural lending programs serving the local farm community. While HMDA lending is not a major product line in this AA, the bank is also ranked first (with another reporter) for HMDA loan market share. Based on 2024 HMDA- and CRA-reportable data, the bank's lending activity in this AA represented 16.4% of the bank's total lending by number and 9.3% by dollar amount.

Lending to Farms and Businesses of Different Sizes

The bank's distribution of loans among farms and businesses of different sizes is excellent.

Small Farm. The bank's distribution of small farm loans among farms of different sizes is excellent. The table below shows the distribution of small farm loans by revenue and loan size, as well as aggregate lending and demographic data, for 2024.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Northeast Non-MSA AA							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	196	88.7	76.3	23,081	82.1	78.3	99.1
Over $1 Million	25	11.3		5,022	17.9		0.9
Revenue Unknown	0	0.0		0	0.0		0.0
Total	221	100.0		28,103	100.0		100.0
By Loan Size							
$100,000 or Less	128	57.9	63.0	5,575	19.8	21.0	
$100,001 - $250,000	57	25.8	23.7	10,264	36.5	37.8	
$250,001 - $500,000	36	16.3	13.3	12,264	43.6	41.2	
Total	221	100.0	100.0	28,103	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	125	63.8		5,409	23.4		
$100,001 - $250,000	39	19.9		7,003	30.3		
$250,001 - $500,000	32	16.3		10,669	46.2		
Total	196	100.0		23,081	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2024, the bank's lending to farms with gross annual revenues of $1 million or less (defined as small farms) significantly exceeded aggregate lending levels at 88.7% compared to 76.3%. The bank's lending was below the percentage of small farms in the AA (99.1%). By dollar volume, 82.1% of the bank's small farm lending was to farms with revenues of $1 million or less, also exceeding aggregate lending levels of 78.3%.

Despite the competitive agricultural lending environment and challenging agricultural conditions in the AA, the bank remains a strong small farm loan lender. Of the 300 small farm loans reported in the AA in 2024, the bank originated 221, or 73.7%, of the loans and was the leading small farm lender by more than 190 loans.

Small Business. The bank's distribution of small business loans among businesses of different sizes is excellent. The table below shows the distribution of small business loans by revenue and loan size for 2024, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Northeast Non-MSA AA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	39	70.9	59.5	2,143	56.5	49.4	89.1
Over $1 Million	15	27.3		1,635	43.1		8.1
Revenue Unknown	1	1.8		15	0.4		2.8
Total	55	100.0		3,793	100.0		100.0
By Loan Size							
$100,000 or Less	40	72.7	91.5	1,560	41.1	52.8	
$100,001 - $250,000	15	27.3	8.1	2,233	58.9	41.7	
$250,001 - $1 Million	0	0.0	0.4	0	0.0	5.5	
Total	55	100.0	100.0	3,793	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	32	82.1		1,191	55.6		
$100,001 - $250,000	7	17.9		952	44.4		
$250,001 - $1 Million	0	0.0		0	0.0		
Total	39	100.0		2,143	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2024, the bank's lending to businesses with gross annual revenues of $1 million or less (defined as small businesses) significantly exceeded aggregate lending levels at 70.9% compared to 59.5%. The bank's lending was below the percentage of small businesses in the AA (89.1%). By dollar volume, 56.5% of the bank's small business lending was to businesses with revenues of $1 million or less, also exceeding aggregate performance of 49.4%.

The bank operates in a competitive small business lending environment with competition from various creditors, including large national banks with significant credit card operations and local banks. Despite the competition and limited commercial loan demand, the bank was the top lender in the AA in 2024 based on CRA-reportable loans, of which the bank's loans represented 22.3%.

Geographic Distribution of Loans

Overall, the bank's geographic distribution and dispersion of small farm and small business loans in the Northeast Non-MSA AA is good. Small farm geographic distribution is good, while small business geographic distribution is adequate. The bank's dispersion does not show any unexplained gaps in lending. The 2024 AA consists of two moderate-income and three middle-income census tracts, as well as one upper-income tract.

Small Farm. The bank's geographic distribution of small farm loans is good. The table below shows the bank's 2024 small farm loans by income level of census tract, as well as aggregate lending and demographic data.

Distribution of 2024 Small Farm Lending By Income Level of Geography Northeast Non-MSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	60	27.1	26.0	7,965	28.3	27.7	27.2
Middle	126	57.0	57.3	14,831	52.8	52.5	55.9
Upper	35	15.8	16.3	5,307	18.9	19.7	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	
Total	221	100.0	100.0	28,103	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending in moderate-income census tracts was 27.1% by number of loans, which is comparable to aggregate lenders' performance and demographics for moderate-income tracts. By dollar volume, the bank's lending in moderate-income tracts was 28.3%, also comparable to aggregate lenders' performance (27.7%) and the demographic distribution of farms. The bank originated small farm loans in all census tracts in the AA.

Small Business. The geographic distribution of small business loans is adequate. The table below shows the bank's 2024 small business loans by income level of census tract, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Income Level of Geography Northeast Non-MSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	14.5	19.4	540	14.2	14.3	28.7
Middle	22	40.0	47.0	1,515	39.9	32.5	58.7
Upper	25	45.5	30.4	1,738	45.8	52.3	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	3.2	0	0.0	0.9	
Total	55	100.0	100.0	3,793	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending in moderate-income census tracts, 14.5% by number of loans, was below aggregate lending at 19.4% and significantly below the 28.7% of businesses located in moderate-income tracts. The bank does not operate a branch in Poplar, Montana, which is in one of the AA's two moderate-income census tracts; another bank has a branch that serves the area. Limited small business loan demand and competition likely explain the bank's lower lending penetration in moderate-income areas. However, the bank did make small business loans in all census tracts in the AA.

Innovative and Flexible Lending Practices

Overall, the bank makes extensive use of innovative and/or flexible lending programs; participation in these programs helped meet AA credit needs. A description of the bank's flexible lending programs is discussed in the Institution section of this report.

Community Development Loans

The bank makes an adequate level of CD loans in the AA. The bank originated one CD loan for $308,334 during the evaluation period. This loan financed the acquisition of an apartment complex that provides affordable rental housing in an underserved tract of this rural AA.

CD lending opportunities in this AA are limited due to its rural nature and agriculture-dominated economy. Overall, the bank's CD lending shows adequate responsiveness to AA needs given these AA characteristics.

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments in the form of donations in the Northeast Non-MSA AA. The bank did not make any qualified non-donation investments in the AA during the evaluation period. As previously mentioned, bank management noted strong competition for qualified CD investment opportunities. Additionally, the rural nature of this AA generally limits the availability of such opportunities.

The bank made a significant level of qualified investments in the form of donations, as shown in the table. During the evaluation period, the bank made 20 donations totaling $14,725. By dollar and number, the bank primarily supported organizations that provide community services to LMI individuals and families, including organizations supporting local schools and healthcare facilities in underserved and moderate-income areas. The bank also supported economic development efforts in the AA. These donations address critical needs in this rural, agriculture-driven AA to help support healthcare and education needs. The bank's donations show good responsiveness to needs in the AA.

Qualified Investment Donations in the Northeast Non-MSA AA		
Purpose	**#**	***$***
Community Service	13	11,695
Economic Development	5	2,830
Revitalize or Stabilize	2	200
Total	**20**	**$14,725**

SERVICE TEST

The bank's delivery systems are readily accessible to geographies and individuals throughout the AA. Branch changes have improved accessibility to geographies and individuals of different income levels. Retail services do not vary in a way that inconveniences certain individuals or areas. The bank provides a relatively high level of CD services.

Retail Services

The bank's delivery systems, such as branches, drive-up facilities, and ATMs, are readily accessible to the bank's geographies and to individuals of different income levels. The table below shows the bank's distribution of branches by census tract income level as of December 31, 2025.

Geographic Distribution of Branches
Northeast Non-MSA AA

Tract Income Levels		BRANCHES							DEMOGRAPHICS			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	**Total**	**1**	**20.0%**	**0**	**0**	**1**	**0**	**0**				
	DTO	0		0	0	0			2	33.3%	40.3%	26.9%
	LS	0		0	0							
Middle	**Total**	**2**	**40.0%**	**0**	**0**	**1**	**0**	**0**				
	DTO	0		0	0	0			3	50.0%	50.6%	57.5%
	LS	0		0	0							
Upper	**Total**	**2**	**40.0%**	**0**	**0**	**1**	**0**	**0**				
	DTO	0		0	0	0			1	16.7%	9.1%	15.6%
	LS	0		0	0							
	Total	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				

Geographic Distribution of Branches Northeast Non-MSA AA												
Unknown	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
	Total	**5**	**100.0%**	**0**	**0**	**3**	**0**	**0**				
Totals	DTO	0		0	0	0			6	100.0%	100.0%	100.0%
	LS	0		0	0							
DTO - Drive Thru Only LS - Limited Service Shaded rows indicate totals; unshaded rows are a subset of shaded rows *Closed branches are only included in the "Closed" columns and are not included in any other totals LPOs not included in totals.												

The bank operates five full-service branches in the Northeast Non-MSA AA: one branch in each of the communities of Wolf Point, Hinsdale, Glasgow, Froid, and Culbertson. The latter four branches are new to the bank as of 2022, two of which gave the bank a presence in Valley County, an underserved middle-income area. The Wolf Point branch is located in one of the moderate-income census tracts. The Froid and Culbertson branches are in an upper-income tract but only five miles from a moderate-income tract. Three branches (Glasgow, Wolf Point, and Culbertson) have drive-up facilities and all branches have ATMs. The bank also operates four stand-alone ATMs in the AA, with two operating seasonally. The bank's branch distribution in the moderate-income tracts (20.0%) is below the percentage of moderate-income tracts (33.3%) and moderate-income households (40.3%) in the AA. However, as mentioned, the Froid and Culbertson branches are near a moderate-income tract.

The bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the addition of the acquired branches, the bank is more accessible to the moderate-income portion of the AA and Valley County.

Finally, the bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Branch hours and product offerings at the AA level generally reflect that of the overall bank, which are described in the Institution section of this report.

Community Development Services

The bank provided a relatively high level of CD services in this AA. The table to the right shows that all CD services supported revitalization or stabilization of qualified geographies.

Community Development Services in the Northeast Non-MSA AA	
Purpose	**#**
Revitalize or Stabilize	13
Total	**13**

During the evaluation period, four bank employees provided 13 CD services to six organizations. Bank employees provided financial services and expertise by serving as board members, finance committee members, treasurers, and presenters. The services supported organizations working to revitalize and stabilize moderate-income and underserved middle-income rural communities. These organizations focus on providing healthcare, education, and community vitality-related services. The bank's level of CD services is relatively high given the AA's needs and limited qualified CD service opportunities.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HELENA MSA ASSESSMENT AREA

Bank Information. The bank operates five full-service branches in the Helena MSA AA: four in Helena and one in Townsend. The bank did not open or close any branches in this AA during the evaluation period. These five branches represent 16.7% of the bank's offices.

According to the June 30, 2025, FDIC Deposit Market Share Report, the bank ranks second out of 14 financial institutions operating in the AA, with 17.8% of the market's deposits and $465.3 million in deposits. The bank's deposits in this AA represent 26.6% of its total deposits. The bank faces strong competition in this AA. The top five institutions have 71.7% of the market's deposits. The bank also competes with credit unions not represented in the FDIC deposit market share information.

Assessment Area Information. The Helena MSA AA is located in west-central Montana and consists of Broadwater, Jefferson, and Lewis and Clark counties, which comprise the Helena MSA as of 2024. Prior to 2024, these counties were designated as nonmetropolitan and part of the bank's Non-MSA AA. Helena is the state capital and serves as the urban center of the AA, with the surrounding areas being more rural.

The AA has a population of 89,832 and includes 22 census tracts: three moderate-income, 14 middle-income, and five upper-income tracts.

The following Combined Demographics Report table provides demographic information for this AA.[6]

2024 Helena MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0	0	0	0	0	4,204	19.2
Moderate	3	13.6	1,895	8.6	311	16.4	4,050	18.5
Middle	14	63.6	16,097	73.4	910	5.7	4,782	21.8
Upper	5	22.7	3,933	17.9	15	0.4	8,889	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**22**	**100.0**	**21,925**	**100.0**	**1,236**	**5.6**	**21,925**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0	0	0	0	0	0
Moderate	3,949	2,305	8.8	58.4	660	16.7	984	24.9
Middle	28,293	19,068	72.6	67.4	7,166	25.3	2,059	7.3

[6] The FFIEC adjusted census data is based on decennial U.S. Census data and five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

2024 Helena MSA AA Demographics								
Upper	7,392	4,877	18.6	66	1,307	17.7	1,208	16.3
Unknown	0	0	0	0	0	0	0	0
Total AA	**39,634**	**26,250**	**100.0**	**66.2**	**9,133**	**23.0**	**4,251**	**10.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0	0	0	0	0	0	0
Moderate	366	7.7	337	7.8	22	7.4	7	5.6
Middle	3,512	73.8	3,177	73.2	229	76.8	106	84.8
Upper	884	18.6	825	19	47	15.8	12	9.6
Unknown	0	0	0	0	0	0	0	0
Total AA	**4,762**	**100.0**	**4,339**	**100.0**	**298**	**100.0**	**125**	**100.0**
Percentage of Total Businesses:				**91.1**		**6.3**		**2.6**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0	0	0	0	0	0	0	0
Moderate	38	15.6	37	15.5	1	20	0	0
Middle	170	70	167	70.2	3	60	0	0
Upper	35	14.4	34	14.3	1	20	0	0
Unknown	0	0	0	0	0	0	0	0
Total AA	**243**	**100.0**	**238**	**100.0**	**5**	**100.0**	**0**	**.0**
Percentage of Total Farms:				**97.9**		**2.1**		**.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Helena MSA for the year of loan origination. The table below shows the estimated income for 2024 and the range for low-, moderate-, middle- and upper-income borrowers.

Helena MSA AA Borrower Income Levels

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2024	**$100,500**	0 - $50,249	$50,250 - $80,399	$80,400 - $120,599	$120,600 - & above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for the Helena MSA, which was $84,587 for 2024.

Population. According to 2024 FFIEC census-based data, the total population of the AA is 89,832. Lewis and Clark County contains approximately 79.0% of the AA's population, with Jefferson County (13.5%) and Broadwater County (7.5%) being significantly more rural. The table below describes the population growth of 8.8% in the AA based on the 2020 U.S. Census Bureau Decennial Census compared to the 2011-2015 American Community Survey. The growth rate in the AA exceeds the statewide growth rate of 6.9%, with Broadwater County experiencing particularly strong growth at 19.0%. Approximately 5.6% of families in the AA are below the poverty level.

Helena MSA AA 2024 Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Helena MSA AA 2024	82,551	89,832	8.8%
Broadwater County, MT	5,692	6,774	19.0%
Jefferson County, MT	11,502	12,085	5.1%
Lewis and Clark County, MT	65,357	70,973	8.6%
Montana	1,014,699	1,084,225	6.9%
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

Housing Information. According to 2024 FFIEC adjusted census data, the AA has 39,634 housing units: 66.2% are owner occupied, 23.0% are rental units, and 10.7% are vacant. The vacancy rate in the AA is notably lower than the statewide vacancy rate of 15.3%, suggesting stronger housing demand in the AA. The median age of the housing stock is 41 years, which is comparable to the statewide median age of 42 years. The median housing value is $266,315, which is higher than the statewide median housing value of $244,900. The affordability ratio for the AA is 24.2, compared to 23.1 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly more affordable in the AA than for statewide Montana, despite higher median housing values, due to correspondingly higher household incomes.

Bank management noted that the real estate market has cooled during the evaluation period due to higher interest rates and elevated living expenses. Housing prices declined slightly from recent highs that escalated after the onset of the COVID-19 pandemic. However, housing affordability remains a challenge in the AA. The cost of living is extremely high, making homeownership difficult even for working professionals.

The table below shows the housing cost burden for renters and owners by geography and income level in the Helena MSA AA. Overall, the housing cost burden for homeowners and renters in the AA is generally comparable to the burden for those in statewide Montana. The cost burden for low-income renters, with the exception of renters in Jefferson County, is significantly higher than the burden for other homeowners and renters. However, cost burden is above 30.0% for certain moderate-income renters and all LMI owners.

Helena MSA AA Housing Cost Burden						
	Cost Burden - Renters			**Cost Burden - Owners**		
Area	**Low Income**	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Helena MSA AA	70.1%	28.7%	35.2%	58.0%	42.7%	22.8%
Broadwater County, MT	73.7%	44.4%	36.9%	38.7%	31.6%	23.3%
Jefferson County, MT	43.1%	6.3%	18.1%	44.0%	40.5%	22.4%

Helena MSA AA Housing Cost Burden						
Lewis and Clark County, MT	71.8%	30.7%	36.6%	64.6%	43.9%	22.8%
Montana	71.8%	34.1%	38.5%	58.2%	32.5%	20.4%
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy						

General Economic and Business Information. According to bank management, the local economy in the Helena MSA is steady and stable due to the significant presence of state and federal government employment. The economy has experienced moderate growth with minimal fluctuations. Besides government, key industries include finance, healthcare, and manufacturing. Residential real estate construction also contributes to economic activity. Other impactful aspects of the economy include small businesses and commercial real estate activity.

According to bank management, competition for workers remains strong, particularly for entry-level positions, though labor market conditions have eased slightly from the tight conditions experienced in 2022. As shown in the table below, the unemployment rate in the Helena MSA AA remained low throughout the evaluation period and was consistently comparable to the statewide rate. Unemployment in the AA declined from 5.1% in 2020 to a low of 2.5% in 2022 and 2023, before increasing slightly to 2.7% in 2024. The statewide unemployment rate also rose in 2020 but has been stable since 2022.

Helena MSA AA Unemployment Rates			
Area	**2022**	**2023**	**2024***
Helena MSA AA	2.5%	2.5%	2.7%
Broadwater County, MT	2.6%	2.5%	2.5%
Jefferson County, MT	2.6%	2.7%	2.8%
Lewis and Clark County, MT	2.5%	2.5%	2.7%
Montana	2.7%	2.7%	3.0%
Source: BLS, Local Area Unemployment Statistics			
**Year to date annual average as of November 2024*			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HELENA MSA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in the Helena MSA AA is good. Examiners weighted HMDA lending more than small business lending based on higher HMDA loan volume.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. For HMDA loans, the bank ranked fourth among 172 lenders reporting HMDA-reportable loans in 2024, with 6.5% market share.[7] The bank ranked seventh, with 4.1% market share among 70 lenders reporting CRA-reportable loans in 2024. During the evaluation period, lending activity in this AA represented 14.5% by number and 13.9% by dollar amount of the bank's total lending.

[7] As mentioned previously, this MSA AA became effective for 2024 (at the same time the bank started reporting CRA lending data); therefore, only 2024 bank and aggregate lender data is stated here.

Loans to Borrowers of Different Income Levels and Businesses of Different Sizes

Overall, the bank's distribution of loans by borrower income and revenue size in the Helena MSA AA is good. HMDA borrower distribution is good, while small business borrower distribution is adequate.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2024, as well as aggregate lending and demographic data.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level
Helena MSA AA

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	2.2	2.6	250	1.4	0.9	19.2
Moderate	6	13.3	14.9	1,558	8.7	9.9	18.5
Middle	14	31.1	22.8	5,152	28.8	19.9	21.8
Upper	17	37.8	38.7	8,966	50.0	46.7	40.5
Unknown	7	15.6	21.0	1,993	11.1	22.6	0.0
Total	45	100.0	100.0	17,919	100.0	100.0	100.0
Refinance Loans							
Low	1	2.9	5.4	50	1.1	2.7	19.2
Moderate	6	17.1	13.7	683	15.3	8.4	18.5
Middle	10	28.6	21.4	1,395	31.2	17.0	21.8
Upper	15	42.9	35.7	1,618	36.1	41.2	40.5
Unknown	3	8.6	23.7	730	16.3	30.7	0.0
Total	35	100.0	100.0	4,476	100.0	100.0	100.0
Home Improvement Loans							
Low	3	6.7	6.1	99	2.6	4.1	19.2
Moderate	9	20.0	19.3	380	9.8	13.7	18.5
Middle	11	24.4	25.5	838	21.6	21.5	21.8
Upper	21	46.7	42.0	2,411	62.2	50.5	40.5
Unknown	1	2.2	7.1	150	3.9	10.2	0.0
Total	45	100.0	100.0	3,878	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	5	3.4	4.0	399	1.4	1.5	19.2
Moderate	28	19.2	15.5	3,196	11.2	9.7	18.5
Middle	40	27.4	22.6	7,640	26.8	19.2	21.8
Upper	62	42.5	38.5	14,368	50.5	45.7	40.5
Unknown	11	7.5	19.4	2,873	10.1	23.9	0.0
Total	146	100.0	100.0	28,476	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level Helena MSA AA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	4.3	0	0.0	3.5	19.2
Moderate	4	28.6	20.9	182	13.2	11.7	18.5
Middle	5	35.7	20.9	255	18.5	16.9	21.8
Upper	5	35.7	41.7	945	68.4	49.6	40.5
Unknown	0	0.0	12.2	0	0.0	18.3	0.0
Total	14	100.0	100.0	1,382	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	8.3	0	0.0	4.9	19.2
Moderate	3	42.9	19.8	393	47.9	12.7	18.5
Middle	0	0.0	24.0	0	0.0	20.2	21.8
Upper	4	57.1	43.8	428	52.1	55.5	40.5
Unknown	0	0.0	4.2	0	0.0	6.7	0.0
Total	7	100.0	100.0	821	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	19.2
Moderate	0	0.0	0.0	0	0.0	0.0	18.5
Middle	0	0.0	0.0	0	0.0	0.0	21.8
Upper	0	0.0	0.0	0	0.0	0.0	40.5
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's 2024 HMDA lending to LMI borrowers was comparable to aggregate lenders' performance. Lending to moderate-income borrowers at 19.2% exceeded aggregate at 15.5% and demographics at 18.5%. Lending to low-income borrowers at 3.4% was comparable to aggregate at 4.0%, though both are significantly below demographics at 19.2%. This is likely due to affordability issues for low-income borrowers.

The bank operates in a competitive lending environment with competition from regional banks, national banks, credit unions, and internet-based mortgage lenders. Management stated that competition for good loans has increased significantly as more financial institutions enter the Helena MSA, all during a time of slowed loan demand from borrowers due to increased interest rates and housing costs.

As discussed previously, housing affordability is a challenge for LMI borrowers in the AA. Standard lending guidelines suggest borrowers can afford homes priced at roughly three times their annual income. In the Helena MSA, where the 2024 FFIEC median family income is $100,500, this means low-income individuals (earning up to $50,250) could afford homes up to $150,750, while moderate-income individuals (earning up to $80,400) could afford homes up to $241,200. With the median home value at $266,315 according to 2024 FFIEC census data, homeownership remains out of reach for most low-income families and likely many moderate-income families. A community contact noted that the Helena area has experienced significant increases in housing costs in recent years, with home purchase prices rising sharply while rental prices have remained relatively affordable. Bank management also noted inventory levels and days on the market for homes remain below historical levels.

Small Business. The bank's distribution of small business loans among businesses of different sizes is adequate. The following table shows the distribution of small business loans by revenue and loan size for 2024, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses
Helena MSA AA

	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	48	48.0	57.7	8,124	38.3	45.9	91.1
Over $1 Million	47	47.0		12,391	58.4		6.3
Revenue Unknown	5	5.0		694	3.3		2.6
Total	100	100.0		21,209	100.0		100.0
By Loan Size							
$100,000 or Less	58	58.0	92.6	2,698	12.7	37.9	
$100,001 - $250,000	20	20.0	3.8	3,824	18.0	15.8	
$250,001 - $1 Million	22	22.0	3.6	14,687	69.2	46.3	
Total	100	100.0	100.0	21,209	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	34	70.8		1,423	17.5		
$100,001 - $250,000	6	12.5		1,209	14.9		
$250,001 - $1 Million	8	16.7		5,492	67.6		
Total	48	100.0		8,124	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

For 2024, the bank's lending to businesses with gross annual revenues of $1 million or less (defined as small businesses), 48.0%, was below aggregate lenders' performance, 57.7%. The bank's lending was significantly below the percentage (91.1%) of small businesses in the AA. By dollar volume, 38.3% of the bank's small business lending was to businesses with revenues of $1 million or less, also below aggregate performance of 45.9%.

The bank operates in a competitive small business lending environment among various creditors, including regional banks, national banks, credit unions, and non-bank lenders. According to management, multiple lenders may pursue each small business lending opportunity. In addition, the bank made 70.8% of its loans to small businesses in amounts of $100,000 or less. This shows a willingness to meet the credit needs of smaller businesses.

Geographic Distribution

Overall, the bank's geographic distribution of loans in the Helena MSA AA is good. HMDA loan and small business loan geographic distributions are good. The bank's dispersion of these loans does not reflect unexplained gaps in lending. The bank's 2024 AA consisted of three moderate-income, 14 middle-income, and five upper-income census tracts.

Residential Real Estate. The bank's geographic distribution of HMDA loans is good. The tables below display the distribution of the bank's 2024 HMDA loans by census tract income level, as well as aggregate lending and demographic data.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography Helena MSA AA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	8.9	8.2	955	5.3	5.9	8.8
Middle	36	80.0	72.0	14,550	81.2	72.6	72.6
Upper	5	11.1	19.8	2,414	13.5	21.5	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	17,919	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	5.7	7.1	260	5.8	7.0	8.8
Middle	27	77.1	76.1	3,633	81.2	74.8	72.6
Upper	6	17.1	16.8	583	13.0	18.2	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	4,476	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.2	9.4	25	0.6	6.9	8.8
Middle	35	77.8	69.8	3,224	83.1	73.7	72.6
Upper	9	20.0	20.8	629	16.2	19.4	18.6

Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	3,878	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.7	0	0.0	49.1	2.8
Middle	3	75.0	84.6	1,809	66.3	46.7	70.4
Upper	1	25.0	7.7	921	33.7	4.1	26.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,730	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	10	6.7	7.7	1,950	6.2	7.6	8.8
Middle	115	76.7	73.1	24,441	78.3	72.2	72.6
Upper	25	16.7	19.1	4,815	15.4	20.2	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	150	100.0	100.0	31,206	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography
Helena MSA AA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	14.3	2.6	390	28.2	3.7	8.8
Middle	11	78.6	74.8	897	64.9	73.1	72.6
Upper	1	7.1	22.6	95	6.9	23.2	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,382	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	14.3	7.3	320	39.0	12.1	8.8
Middle	3	42.9	74.0	328	40.0	62.6	72.6
Upper	3	42.9	18.8	173	21.1	25.4	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	821	100.0	100.0	100.0

Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	33.3	0	0.0	38.2	8.8
Middle	0	0.0	66.7	0	0.0	61.8	72.6
Upper	0	0.0	0.0	0	0.0	0.0	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's lending in moderate-income tracts in 2024 is comparable to both aggregate lenders and demographics. In 2024, the bank originated 6.7% of its HMDA loans in moderate-income tracts compared to 7.7% for aggregate lenders. Demographics show that only 8.8% of owner-occupied housing units are in the moderate-income tracts. The bank made HMDA loans in all moderate-income tracts, as well as all other tracts in the AA. As previously noted, strong competition exists in the AA while loan demand is slow.

Small Business. The bank's geographic distribution of small business loans is good. The following table shows the bank's 2024 small business loans by income level of census tract, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Income Level of Geography
Helena MSA AA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	8.0	6.9	1,098	5.2	5.3	7.7
Middle	65	65.0	72.1	15,468	72.9	73.2	73.8
Upper	27	27.0	20.3	4,643	21.9	21.4	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.1	
Total	100	100.0	100.0	21,209	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2024, the bank's small business lending in moderate-income census tracts was comparable to both aggregate lenders' performance and demographics. The bank originated 8.0% of its small business loans by number in moderate-income tracts compared to 6.9% for aggregate lenders' performance. The bank's lending is comparable to demographics that show 7.7% of businesses located in these tracts. By loan dollars, 5.2% of the bank's lending was in moderate-income tracts, comparable to aggregate at 5.3%.

The bank originated small business loans in two of three moderate-income census tracts in the AA; the tract without loans is a sparsely populated area. The bank made small business loans in nearly all other tracts. Similar to HMDA lending, the competitive banking environment also impacts lending opportunities.

Innovative and Flexible Lending Practices

Overall, the bank makes extensive use of innovative and/or flexible lending programs; participation in these programs helped meet AA credit needs. A description of the bank's flexible lending programs is discussed in the Institution section of this report.

Community Development Loans

The bank makes an adequate level of CD loans in the Helena MSA AA. As shown in the table, the bank originated four CD loans, totaling approximately $1.4 million during the evaluation period. By dollar, most of the bank's CD loans supported affordable housing (specifically LIHTC income-restricted rental units), which addresses a significant need in the AA given rising housing costs and limited affordable housing supply. The remaining loans supported construction-related costs for a homeless shelter addition. The bank's CD lending shows good responsiveness to AA needs.

Community Development Lending in the Helena MSA AA

Purpose	#	$
Affordable Housing	2	1,079,959
Community Services	2	350,500
Total	**4**	**1,430,459**

INVESTMENT TEST

Overall, the bank has a significant level of qualified investments in the form of donations in the Helena MSA AA. The bank did not make any qualified investments in securities during the evaluation period. As previously mentioned, bank management noted that qualified CD investment opportunities are generally limited and highly sought after by potential investors.

The bank made a significant level of qualified investments in the form of donations, as shown in the table. During the evaluation period, the bank made 54 donations totaling approximately $146,000. Most donations supported community service organizations providing essential services to LMI individuals and families, including healthcare, education, provision of food, transitional housing, and provision of school necessities for area children (such as clothing, shoes, and classroom supplies). The bank's level of donations that address basic needs of LMI individuals and families, specifically education, healthcare, and food, in the AA reflects the bank's established presence in the market, as well as good responsiveness to CD needs.

Qualified Investment Donations in the Helena MSA AA

Purpose	#	$
Community Service	51	142,485
Economic Development	1	1,500
Affordable Housing	1	1,562
Revitalize or Stabilize	1	500
Total	**54**	**146,046**

SERVICE TEST

The bank's delivery systems are readily accessible to geographies and individuals throughout the AA, and retail services do not vary in a way that inconveniences certain individuals or areas. The bank provides a relatively high level of CD services.

Retail Services

The bank's delivery systems, such as branches, drive-up facilities, and ATMs, are readily accessible to the bank's geographies and to individuals of different income levels. The table below shows the bank's distribution of branches by census tract income level as of December 31, 2025.

Geographic Distribution of Branches
Helena MSA AA

Tract Income Levels		BRANCHES							DEMOGRAPHICS			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	**Total**	**1**	**20.0%**	**0**	**0**	**1**	**0**	**0**	3	13.6%	8.4%	8.1%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	**Total**	**4**	**80.0%**	**0**	**0**	**4**	**0**	**1**	14	63.6%	74.1%	73.6%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	5	22.7%	17.5%	18.4%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0	0						
Totals	**Total**	**5**	**100.0%**	**0**	**0**	**5**	**0**	**1**	22	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0	0						

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

The bank operates five full-service branches in the Helena MSA AA: four branches located in Helena and one in Townsend. All five branches have drive-up facilities and ATMs. The Townsend branch is located in a moderate-income census tract, and three of the Helena branches are less than a mile from the moderate-income tract in Helena. The remaining moderate-income tract is a rural portion of the AA, that is sparsely populated and includes national forest land. Additionally, the bank operates a stand-alone ATM in the AA. The bank's branch distribution in the moderate-income tracts (20.0%) exceeds the percentage of moderate-income tracts (20.0%) and moderate-income households (8.4%) in the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank has not opened or closed any branches in this AA.

Additionally, the bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Branch hours and product offerings at the AA level generally reflect that of the overall bank, which are described in the Institution section of this report.

Community Development Services

Community Development Services in the Helena MSA AA	
Purpose	**#**
Community Services	16
Economic Development	1
Total	**17**

The bank provided a relatively high level of CD services in this AA. The table to the right shows the bank's service activity by purpose category. During the evaluation period, 10 bank employees provided 17 CD services to 10 organizations. Bank employees provided financial services and expertise by serving in roles such as board members, finance committee members, coordinators for fundraisers, and financial education instructors. The services primarily supported organizations that provide essential community services to LMI individuals, such as shelter, job assistance, trauma response services (mental health services, substance use recovery support, and parenting education), and access to youth centers. The bank's level of CD services is relatively high given the bank's capacity and responsiveness to the AA's needs.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BILLINGS MSA ASSESSMENT AREA

Bank Information. The bank operates three full-service branches in the Billings MSA AA, all located in Billings. Since the previous evaluation, the bank did not open or close any branches in the AA. The bank established its three Billings branches between 2019 and 2022, and management indicated they continue to build the bank's market presence in this AA. These three branches represent 10.0% of the bank's offices.

According to the June 30, 2025, FDIC Deposit Market Share Report, the bank ranks eighth out of 13 financial institutions operating in the AA, with 1.4% of the market's deposits and $110.5 million in deposits. The bank's deposits in this AA represent 6.3% of its total deposits. The bank faces significant competition in this AA. The top six institutions have 93.5% of the market's deposits. The bank also competes with credit unions not represented in the FDIC deposit market share information.

Assessment Area Information. The Billings MSA AA is located in south-central Montana and consists of Yellowstone, Carbon, and Stillwater counties. Billings is Montana's largest city, located in Yellowstone County, and serves as the urban center of the AA, with the surrounding counties being more rural. The AA includes a small portion of the Crow Indian Reservation; tribal headquarters are in Crow Agency, Montana (in Big Horn County outside of the bank's AA).

The AA has a population of 184,167 and includes 44 census tracts: nine moderate-income, 28 middle-income, and seven upper-income tracts. Based on census data changes, the number of census tracts in the AA increased from 40 to 44 tracts since the previous evaluation.

The following Combined Demographics Report table provides demographic information for this AA.[8]

2024 Billings MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	9,587	20.1
Moderate	9	20.5	8,791	18.4	1,024	11.6	8,501	17.8
Middle	28	63.6	27,826	58.4	1,649	5.9	10,441	21.9
Upper	7	15.9	11,053	23.2	480	4.3	19,141	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**44**	**100.0**	**47,670**	**100.0**	**3,153**	**6.6**	**47,670**	**100.0**

[8] The FFIEC adjusted census data is based on decennial U.S. Census data and five-year estimate data; it also reflects the OMB revised MSA delineations as applicable.

2024 Billings MSA AA Demographics								
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	16,886	8,831	16.6	52.3	6,693	39.6	1,362	8.1
Middle	50,613	32,432	60.8	64.1	12,904	25.5	5,277	10.4
Upper	16,457	12,065	22.6	73.3	3,486	21.2	906	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**83,956**	**53,328**	**100.0**	**63.5**	**23,083**	**27.5**	**7,545**	**9.0**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2,368	24.4	2,063	23.2	285	39.6	20	23.3
Middle	5,530	56.9	5,129	57.6	345	47.9	56	65.1
Upper	1,814	18.7	1,714	19.2	90	12.5	10	11.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**9,712**	**100.0**	**8,906**	**100.0**	**720**	**100.0**	**86**	**100.0**
Percentage of Total Businesses:				**91.7**		**7.4**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	28	6.0	26	5.7	1	10.0	1	33.3
Middle	358	76.2	349	76.4	8	80.0	1	33.3
Upper	84	17.9	82	17.9	1	10.0	1	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**470**	**100.0**	**457**	**100.0**	**10**	**100.0**	**3**	**100.0**
Percentage of Total Farms:				**97.2**		**2.1**		**0.6**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Income. For purposes of classifying borrower income, this evaluation uses the FFIEC's estimated median family income for the Billings MSA for the year of loan origination. The table below shows the estimated income for each year and the range for low-, moderate-, middle-, and upper-income borrowers.

Borrower Income Levels
Billings MSA AA Borrower Income Levels

FFIEC Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2022	**$84,800**	0	-	$42,399	$42,400	-	$67,839	$67,840	-	$101,759	$101,760	-	& above
2023	**$95,200**	0	-	$47,599	$47,600	-	$76,159	$76,160	-	$114,239	$114,240	-	& above
2024	**$100,000**	0	-	$49,999	$50,000	-	$79,999	$80,000	-	$119,999	$120,000	-	& above

For purposes of classifying census tracts by income level, this evaluation relies on the FFIEC adjusted census data median family income for the Billings MSA, which was $80,720 for 2022 through 2024.

Population. According to 2024 FFIEC adjusted census data, the AA's total population is 184,167. Yellowstone County, where Billings is located, contains approximately 89.4% of the AA's population; Carbon and Stillwater counties are significantly more rural. The table below shows the population changes in the MSA, the counties in the AA, and the state of Montana. The population growth of 6.3% in the MSA is comparable to the statewide population growth.

Billings MSA AA Population Change			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Billings MSA	173,248	184,167	6.3%
Carbon County, MT	10,268	10,473	2.0%
Stillwater County, MT	9,288	8,963	-3.5%
Yellowstone County, MT	153,692	164,731	7.2%
Montana	1,014,699	1,084,225	6.9%
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

Housing Information. Housing affordability continues to be a challenge in the AA. A contact noted that the Billings area has generally been more affordable than other areas of Montana; however, home prices increased during the COVID-19 pandemic and remain high. The median sales price for Yellowstone County is approximately $350,000. During the evaluation period, residential home construction increased housing stock, particularly on the west side of Billings. Investors have also purchased a notable number of properties in need of repair above market value and turned them into rentals.

According to 2024 FFIEC adjusted census data, the AA has 83,956 housing units: 63.5% are owner occupied, 27.5% are rental units, and 9.0% are vacant. The vacancy rate in the AA is notably lower than the statewide vacancy rate of 15.3%, suggesting stronger housing demand in the AA. The median age of the housing stock is 44 years, which is comparable to the statewide median age of 42 years. The median housing value is $ 240,729, which is comparable to the statewide median housing value of $ 244,900. The affordability ratio for the AA is 26.1, compared to 23.1 for the state. The affordability ratio is defined as the median household income divided by the median housing value; a higher ratio indicates greater affordability. This ratio suggests that, overall, housing is slightly more affordable in the AA than for statewide Montana.

The table below shows the housing cost burden for renters and owners by geography and income level in the Billings MSA, the counties in the AA, and the state of Montana. Overall, the housing cost burden for homeowners and renters in the MSA is generally comparable to the burden for those in statewide Montana. Low-income renters and owners have significant cost-burden throughout the AA.

Billings MSA AA Housing Cost Burden						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Billings MSA	80.0%	38.5%	41.7%	63.3%	34.5%	18.4%
Carbon County, MT	81.7%	23.4%	37.3%	62.4%	28.4%	24.2%
Stillwater County, MT	63.0%	9.5%	29.9%	48.3%	29.0%	19.1%
Yellowstone County, MT	80.5%	40.1%	42.3%	64.7%	35.3%	17.9%
Montana	71.8%	34.1%	38.5%	58.2%	32.5%	20.4%
Cost Burden is housing cost that equals 30 percent or more of household income *Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy*						

General Economic and Business Information. According to bank management, the local economy in the AA is solid and gaining strength, with steady annual growth and significant commercial development. The economy is diverse; primary industries in the AA include healthcare, finance, education, energy, retail, tourism, and agriculture. Billings, a regional healthcare hub, is home to two large regional hospitals that are major employers. Other major employers include the school district, post-secondary schools, oil refineries, financial institutions, and an outdoor hospitality company. According to bank management, banking competition in the AA is strong and has intensified with the entry of new credit unions and non-bank lenders.

A community contact noted a strong labor market with low unemployment; however, area businesses face challenges filling open positions. As shown in the table below, the unemployment rate in the Billings MSA AA remained low throughout the evaluation period and was consistently at or below the statewide rate. Unemployment in the AA ranged from 2.4% in 2022 and 2023 to 2.8% in 2024. During the same period, the statewide unemployment rate ranged from 2.7% to 3.0%.

Billings MSA AA Unemployment Rates			
Area	2022	2023	2024
Billings MSA AA	2.4%	2.4%	2.8%
Carbon County, MT	2.7%	2.6%	2.9%
Stillwater County, MT	2.5%	2.4%	2.8%
Yellowstone County, MT	2.4%	2.4%	2.8%
Montana	2.7%	2.7%	3.0%
Source: BLS, Local Area Unemployment Statistics			

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BILLINGS MSA ASSESSMENT AREA

LENDING TEST

The bank’s Lending Test performance in the Billings MSA AA is good. Examiners weighted HMDA lending more than small business lending due to significantly higher HMDA loan volume.

Lending Activity

Overall, the bank's lending activity reflects excellent responsiveness to AA credit needs. For HMDA loans, the bank ranked second with 9.8% market share among 202 lenders in 2023, and ninth with 3.2% market share among 200 lenders in 2024. For CRA-reportable lending (small business and small farm) in 2024, the bank ranked 13th with 1.8% market share among 72 lenders.[9] During the evaluation period, lending activity in this AA represented 14.1% by number and 12.4% by dollar amount of the bank's total lending. The decline in HMDA market share in 2024 primarily reflects competitive challenges; the bank remains an active HMDA lender.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

Overall, the bank's distribution of loans among borrowers of different income levels and businesses of different sizes is good based on good borrower distribution for both HMDA and small business loans.

Residential Real Estate. The bank's HMDA lending to LMI borrowers is good. The following tables show the bank's HMDA loan data by income level and product type for 2023 and 2024, as well as aggregate lending and demographic data.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level Billings MSA AA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	12	3.3	3.5	2,050	1.9	1.5	5	5.1	4.0	537	2.0	1.8	20.1
Moderate	97	26.6	16.9	19,783	18.6	11.5	19	19.2	17.4	3,704	13.5	12.0	17.8
Middle	98	26.9	23.0	28,296	26.7	20.8	22	22.2	25.6	7,287	26.5	23.3	21.9
Upper	143	39.3	36.7	53,132	50.1	45.8	46	46.5	33.1	14,334	52.1	42.2	40.2
Unknown	14	3.8	19.9	2,851	2.7	20.4	7	7.1	20.0	1,657	6.0	20.7	0.0
Total	364	100.0	100.0	106,112	100.0	100.0	99	100.0	100.0	27,519	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.1	0	0.0	4.7	1	7.1	7.3	40	1.4	3.6	20.1
Moderate	3	15.8	17.7	294	8.4	12.5	2	14.3	17.1	619	22.1	12.3	17.8
Middle	2	10.5	25.1	218	6.2	21.7	5	35.7	19.5	400	14.3	14.8	21.9
Upper	11	57.9	35.1	2,491	71.0	42.6	5	35.7	30.7	1,142	40.8	36.6	40.2
Unknown	3	15.8	14.0	505	14.4	18.5	1	7.1	25.3	600	21.4	32.8	0.0
Total	19	100.0	100.0	3,508	100.0	100.0	14	100.0	100.0	2,801	100.0	100.0	100.0
Home Improvement Loans													
Low	2	6.9	6.8	35	1.7	4.3	0	0.0	4.8	0	0.0	3.4	20.1
Moderate	5	17.2	16.2	220	10.5	12.0	5	16.1	17.9	137	6.6	12.9	17.8
Middle	10	34.5	26.8	521	24.9	20.3	11	35.5	26.9	813	39.4	21.8	21.9
Upper	11	37.9	43.8	1,182	56.5	53.2	13	41.9	44.7	946	45.8	55.4	40.2

[9] As mentioned previously, the bank started reporting CRA lending data in 2024; therefore, only 2024 bank and aggregate lender data is stated here.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Billings MSA AA

Unknown	1	3.4	6.3	134	6.4	10.3	2	6.5	5.7	170	8.2	6.6	0.0
Total	29	100.0	100.0	2,092	100.0	100.0	31	100.0	100.0	2,066	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	3.3	4.9	2,085	1.9	2.2	6	3.8	5.1	577	1.7	2.4	20.1
Moderate	106	24.9	16.9	20,347	18.1	11.7	28	17.6	17.6	4,525	13.5	12.2	17.8
Middle	117	27.5	23.7	29,332	26.1	20.8	42	26.4	24.2	8,736	26.1	21.1	21.9
Upper	171	40.1	37.5	57,289	50.9	45.6	73	45.9	34.3	17,244	51.5	41.5	40.2
Unknown	18	4.2	17.0	3,490	3.1	19.6	10	6.3	18.8	2,427	7.2	22.9	0.0
Total	426	100.0	100.0	112,543	100.0	100.0	159	100.0	100.0	33,509	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Billings MSA AA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.1	0	0.0	1.1	0	0.0	7.5	0	0.0	4.5	20.1
Moderate	1	9.1	20.5	50	7.4	12.9	2	18.2	21.5	65	6.8	18.1	17.8
Middle	4	36.4	21.1	145	21.4	15.4	3	27.3	22.8	210	22.0	16.4	21.9
Upper	6	54.5	44.1	484	71.3	56.1	6	54.5	40.8	680	71.2	50.0	40.2
Unknown	0	0.0	11.2	0	0.0	14.4	0	0.0	7.5	0	0.0	10.9	0.0
Total	11	100.0	100.0	679	100.0	100.0	11	100.0	100.0	955	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.4	0	0.0	6.9	0	0.0	6.3	0	0.0	5.0	20.1
Moderate	0	0.0	12.3	0	0.0	7.1	0	0.0	19.3	0	0.0	15.7	17.8
Middle	3	100.0	27.7	152	100.0	20.0	1	25.0	27.8	26	15.5	18.5	21.9
Upper	0	0.0	46.5	0	0.0	59.3	3	75.0	41.5	142	84.5	44.2	40.2
Unknown	0	0.0	5.2	0	0.0	6.7	0	0.0	5.1	0	0.0	16.6	0.0
Total	3	100.0	100.0	152	100.0	100.0	4	100.0	100.0	168	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	6.7	0	0.0	7.1	0	0.0	0.0	0	0.0	0.0	20.1
Moderate	0	0.0	13.3	0	0.0	17.6	0	0.0	0.0	0	0.0	0.0	17.8
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	12.5	0	0.0	35.1	40.2
Unknown	0	0.0	80.0	0	0.0	75.4	0	0.0	87.5	0	0.0	64.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

The bank's 2024 HMDA lending to LMI borrowers was comparable to aggregate lenders' performance. The bank's lending to moderate-income borrowers was comparable to demographics (17.8%), while lending to low-income borrowers was significantly below demographics (20.1%).

The bank's 2023 HMDA lending to moderate-income borrowers at 24.9% exceeded aggregate lenders at 16.9% and demographics at 17.8%. Lending to low-income borrowers at 3.3% was comparable to aggregate at 4.9% and substantially below demographics at 20.1%.

Housing affordability issues impact lending opportunities to LMI borrowers in the AA. Standard lending guidelines suggest borrowers can afford homes priced at roughly three times their annual income. In the Billings MSA, where the 2024 FFIEC median family income is $100,000, these guidelines mean low-income individuals (earning up to $50,000) could afford homes up to $150,000, while moderate-income individuals (earning up to $80,000) could afford homes up to $240,000. With the median home value at $240,728 according to 2024 FFIEC census data and recent home prices being much higher, homeownership is likely out of reach for most low-income families and some moderate-income families. In addition, competition for homes in the AA from investors is a challenge for potential homebuyers.

The bank operates in a highly competitive lending environment for HMDA loans in this AA. Competitors include various types of creditors, such as regional banks, national banks, credit unions, and internet-based mortgage lenders. Also, while the number of HMDA reporters in the AA stayed relatively similar from 2023 to 2024, total HMDA-reportable loans declined by 10.6%, likely reflecting fewer lending opportunities in 2024 in this competitive market.

Small Business. The bank's distribution of small business loans among businesses of different sizes is good. The tables below show the distribution of small business loans by revenue and loan size for 2024, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Billings MSA AA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	50	63.3	53.2	6,455	56.7	39.4	91.7
Over $1 Million	26	32.9		4,456	39.2		7.4
Revenue Unknown	3	3.8		465	4.1		0.9
Total	79	100.0		11,376	100.0		100.0
By Loan Size							
$100,000 or Less	43	54.4	91.5	2,200	19.3	38.4	
$100,001 - $250,000	24	30.4	5.0	4,423	38.9	20.0	
$250,001 - $1 Million	12	15.2	3.5	4,753	41.8	41.6	
Total	79	100.0	100.0	11,376	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	30	60.0		1,753	27.2		
$100,001 - $250,000	15	30.0		2,646	41.0		

$250,001 - $1 Million	5	10.0		2,056	31.9		
Total	50	100.0		6,455	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2024, the bank's lending to businesses with gross annual revenues of $1 million or less (defined as small businesses), at 63.3%, exceeded aggregate lending levels at 53.2%. The bank's lending was below demographics, showing 91.7% of businesses in the AA are small businesses. By dollar volume, 56.7% of the bank's small business lending was to businesses with revenues of $1 million or less, also exceeding aggregate performance of 39.4%.

The bank operates in a very competitive small business lending environment with a variety of creditors, including regional banks, national banks, and non-bank lenders. Lending activity for the top six CRA loan reporters in this AA in 2024 represented 61.1% of all reported loans. Four of the top reporters are large national banks with significant business credit card operations, and the other two reporters are regional banks with well-established operations and a significant branch presence in the Billings area. Despite significant competition, the bank is an active small business lender in the AA.

Geographic Distribution of Loans

Overall, the bank's geographic distribution of loans in the Billings MSA AA is good. HMDA loan geographic distribution is good, while small business loan geographic distribution is excellent. The bank's dispersion of loans does not show any unexplained gaps in lending. The bank's 2023 and 2024 AAs include nine moderate-income, 28 middle-income, and seven upper-income tracts.

Residential Real Estate. The bank's geographic distribution of HMDA loans is good. The tables below display the distribution of the bank's 2023 and 2024 HMDA loans by census tract income level, as well as aggregate lending and demographic data.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Billings MSA AA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	53	14.6	16.2	11,584	10.9	11.4	13	13.1	15.2	2,823	10.3	11.0	16.6
Middle	207	56.9	57.6	58,591	55.2	56.3	52	52.5	56.8	13,868	50.4	54.6	60.8
Upper	104	28.6	26.3	35,937	33.9	32.3	34	34.3	28.0	10,828	39.3	34.4	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	364	100.0	100.0	106,112	100.0	100.0	99	100.0	100.0	27,519	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.3	17.8	22	0.6	12.8	1	7.1	15.0	40	1.4	10.2	16.6

Middle	15	78.9	61.0	3,223	91.9	61.3	6	42.9	60.1	1,044	37.3	59.8	60.8
Upper	3	15.8	21.2	263	7.5	25.9	7	50.0	25.0	1,717	61.3	30.0	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	3,508	100.0	100.0	14	100.0	100.0	2,801	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	6.9	12.3	50	2.4	9.8	3	9.7	14.7	220	10.6	13.0	16.6
Middle	16	55.2	63.0	1,159	55.4	65.1	17	54.8	56.7	1,055	51.1	50.9	60.8
Upper	11	37.9	24.7	883	42.2	25.2	11	35.5	28.6	791	38.3	36.2	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	2,092	100.0	100.0	31	100.0	100.0	2,066	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	32.0	200	4.5	13.6	0	0.0	26.9	0	0.0	15.1	21.2
Middle	2	66.7	56.0	4,275	95.5	48.3	0	0.0	61.5	0	0.0	20.4	49.2
Upper	0	0.0	12.0	0	0.0	38.1	0	0.0	11.5	0	0.0	64.5	29.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	4,475	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	59	13.8	15.8	11,916	10.2	11.5	20	12.6	14.9	3,178	9.5	10.9	16.6
Middle	247	57.6	59.1	67,684	57.8	57.1	80	50.3	58.1	16,553	49.4	54.7	60.8
Upper	123	28.7	25.1	37,418	32.0	31.4	59	37.1	27.0	13,778	41.1	34.4	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	429	100.0	100.0	117,018	100.0	100.0	159	100.0	100.0	33,509	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Billings MSA AA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	18.2	11.8	60	8.8	5.0	2	18.2	11.8	70	7.3	6.0	16.6
Middle	5	45.5	59.6	340	50.1	60.3	4	36.4	60.1	560	58.6	62.2	60.8
Upper	4	36.4	28.6	279	41.1	34.8	5	45.5	28.1	325	34.0	31.8	22.6

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	679	100.0	100.0	11	100.0	100.0	955	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.0	0	0.0	6.9	1	25.0	10.8	25	14.9	6.8	16.6
Middle	2	66.7	66.5	96	63.2	65.0	1	25.0	65.9	26	15.5	64.0	60.8
Upper	1	33.3	24.5	56	36.8	28.1	2	50.0	23.3	117	69.6	29.3	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	152	100.0	100.0	4	100.0	100.0	168	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.7	0	0.0	4.9	0	0.0	37.5	0	0.0	53.7	16.6
Middle	0	0.0	80.0	0	0.0	85.7	0	0.0	62.5	0	0.0	46.3	60.8
Upper	0	0.0	13.3	0	0.0	9.4	0	0.0	0.0	0	0.0	0.0	22.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2023 and 2024, the bank's lending in the moderate-income tracts was comparable to aggregate lenders' performance. In 2023, the bank's lending in the moderate-income tracts was comparable to demographics, and in 2024, the bank's lending in those tracts was slightly below demographics.

The bank originated 12.6% of its HMDA loans in moderate-income tracts compared to 14.9% for aggregate lenders and 16.6% owner-occupied housing units in 2024. The bank originated 13.8% compared to 15.8% aggregate and 16.6% owner-occupied units in 2023. According to demographic data, 18.4% of AA families reside in the moderate-income tracts; the bank's lending also falls below this demographic.

The bank originated loans in each moderate-income tract in 2023 and eight of nine tracts in 2024. The demographic data indicates that 39.6% of housing units in the moderate-income tracts are rentals, which could limit the bank's opportunity to make HMDA loans in these tracts. In addition, 8.1% of the housing units in the moderate-income tracts are vacant. Over the two years, the bank made HMDA loans in all census tracts in the AA. As previously noted, there is significant competition in the AA for HMDA loans and HMDA loan demand declined during these two years. The bank also has a more limited presence in this AA by branch offices and by time in the market (with one branch being established just prior to the previous evaluation) compared to other financial institutions.

Small Business. The bank's geographic distribution of small business loans is excellent. The following tables show the bank's 2024 small business loans by income level of census tract, as well as aggregate lending and demographic data.

Distribution of 2024 Small Business Lending By Income Level of Geography Billings MSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	22	27.8	21.7	2,846	25.0	30.3	24.4
Middle	33	41.8	54.2	4,964	43.6	46.6	56.9
Upper	24	30.4	23.4	3,566	31.3	23.0	18.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.2	
Total	79	100.0	100.0	11,376	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

In 2024, the bank's small business lending in moderate-income census tracts, 27.8% by number, exceeded aggregate lenders' performance of 21.7% by number and exceeded demographics (24.4%). By loan dollars, the bank's lending in moderate-income tracts at 25.0% was slightly above demographics but below aggregate at 30.3%.

The bank originated small business loans in six of nine moderate-income census tracts, demonstrating good geographic dispersion given the bank's relatively recent entry into the Billings market. The three moderate-income tracts with no small business loans are primarily residential areas. The bank did not originate small business loans in several middle-income tracts and one upper-income tract, which is reasonable given competitive market conditions and the composition of the tracts.

Innovative and Flexible Lending Practices

Overall, the bank makes extensive use of innovative and/or flexible lending programs; participation in these programs helped meet AA credit needs. A description of the bank's flexible lending programs is discussed in the Institution section of this report.

Community Development Loans

The bank makes a relatively high level of CD loans in the Billings MSA AA. As shown in the table, the bank originated three CD loans, totaling approximately $8.9 million, during the evaluation period. The bank's CD loans support multi-family affordable housing and economic development in the AA. The affordable housing loan supports ongoing efforts to increase and maintain affordable housing, a critical need in the AA. The economic development loans facilitate small business growth and job creation, as they funded the construction of a new facility that will create at least 40 new jobs. The bank's CD lending shows good responsiveness to AA needs.

Community Development Lending in the Billings MSA AA		
Purpose	**#**	***$***
Affordable Housing	1	$461,250
Economic Development	2	$8,400,000
Total	**3**	**$8,861,250**

INVESTMENT TEST

Overall, the bank made an adequate level of qualified investments in the form of donations in the Billings MSA AA. The bank did not make any qualified non-donation investments during the evaluation period and did not hold prior-period investments in its portfolio for this AA. Bank management noted that qualified CD investment opportunities in Montana are highly competitive. Additionally, the bank's relatively recent market entry, with Billings branches established between 2019 and 2022, impacts competing for the limited opportunities. As the bank continues to build market presence and community relationships in this AA, the level of investment activity is reasonable.

The bank made an adequate level of qualified investments in the form of donations, as shown in the table at right. During the evaluation period, the bank made 36 donations totaling $41,720 to organizations providing community services for LMI individuals and families. Donations supported community foundations, healthcare organizations, and social service providers serving LMI populations. These organizations work to provide services like emergency and transitional housing, food security, and youth programs. The bank's donations show adequate responsiveness to community needs in the AA.

Qualified Investment Donations in the Billings MSA AA

Purpose	**#**	***$***
Community Service	36	41,720
Total	**36**	41,720

SERVICE TEST

The bank's delivery systems are readily accessible to geographies and individuals throughout the AA. Retail services do not vary in a way that inconveniences certain individuals or areas. The bank provides an adequate level of CD services.

Retail Services

The bank's delivery systems, such as branches, drive-up facilities, and ATMs, are readily accessible to the bank's geographies and to individuals of different income levels. The table below shows the bank's distribution of branches by census tract income level as of December 31, 2025.

Geographic Distribution of Branches
Billings MSA AA

Tract Income Levels		**BRANCHES**							**DEMOGRAPHICS**			
		Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses
		#	%	#	#	#	#	#	#	%	%	%
Low	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**				
	DTO	0		0	0	0			0	0.0%	0.0%	0.0%
	LS	0		0	0							
Moderate	**Total**	**2**	**66.6%**	**0**	**0**	**2**	**0**	**0**				
	DTO	0		0	0	0			9	20.5%	20.3%	23.5%
	LS	0		0	0							
Middle	**Total**	**1**	**33.3%**	**0**	**0**	**1**	**0**	**0**				
	DTO	0		0	0	0			28	63.6%	59.3%	57.8%
	LS	0		0	0							

Geographic Distribution of Branches
Billings MSA AA

Upper	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	7	15.9%	20.4%	18.6%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	**Total**	**0**	**0.0%**	**0**	**0**	**0**	**0**	**0**	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	**Total**	**3**	**100.0%**	**0**	**0**	**3**	**0**	**0**	44	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

The bank operates three full-service branches in the Billings MSA AA, all located in Billings. The bank has operated in this AA since 2019 and opened the newest branch in 2022. Two branches are in moderate-income census tracts; one of these branches is approximately one mile from four moderate-income tracts. The third branch is approximately one mile from two moderate-income tracts. All branches have drive-up facilities and deposit-taking ATMs. The Billings Heights branch features an ITM rather than a traditional ATM, providing enhanced service capabilities, including access to bank personnel during extended weekday hours. The bank's branch distribution in the moderate-income tracts (66.6%) exceeds the percentage of moderate-income tracts (20.5%) and moderate-income households (20.3%) in the AA.

Additionally, the bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Branch hours and product offerings at the AA level generally reflect that of the overall bank, which are described in the Institution section of this report.

Community Development Services

The bank provided an adequate level of CD services in the AA. The table to the right shows that all of the bank's CD service activity in the AA supported the provision of community services to LMI individuals and families.

Community Development Services in the Billings MSA AA	
Purpose	**#**
Community Services	7
Total	**7**

During the evaluation period, three bank employees provided seven CD services to five organizations serving LMI individuals and families in the region. Bank employees provided financial services and expertise by serving in roles such as board members, finance committee members, treasurers, and fundraising committee members. The bank supported organizations that provide essential community services to LMI individuals, including shelter for homeless individuals, child abuse prevention and support, and emergency assistance. The bank's level of CD services is adequate given the AA's needs and competitive factors, including the bank's market presence and the capacity.

NONMETROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FERGUS ASSESSMENT AREA

The bank operates two branches in this AA, which consists of Fergus County, in Denton and Winifred, Montana. The Winifred branch has an ATM. Both branches are located in upper-income census tracts. The bank has not changed this AA or branch operations in this AA since the previous evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FERGUS ASSESSMENT AREA

Examiners determined the bank's lending, investment, and service test performances in this AA are below the performance in the full-scope non-MSA AA in the state. The lending test included an analysis of 2024 small business lending. The lending, investment, and service test performances reflect a lack of CD lending and limited levels of qualified investments and CD services.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NON-MSA ASSESSMENT AREA

The bank operates four branches in this AA, which consists of Madison, Ravalli, and Silver Bow counties. The branches are located in Butte, Hamilton, Sheridan, and Twin Bridges, Montana. The branches offer drive-up services and ATMs. For 2022 and 2023, this AA included Broadwater, Deer Lodge, Gallatin, Jefferson, Lewis and Clark, Madison, Park, Ravalli, Silver Bow, Sweet Grass, and Teton counties. In 2024, the bank changed the composition of this AA to Madison, Ravalli, and Silver Bow counties due to MSA delineation changes. The bank closed a branch (Bozeman Mendenhall) in this AA in December 2023; this branch was in an upper-income tract. The bank has one branch in a moderate-income census tract, and three branches in middle-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NON-MSA ASSESSMENT AREA

Examiners determined the bank's lending test performance in this AA is consistent with the performance in the full-scope non-MSA AA in the state, while the investment and service test performances are above that of the full-scope AA. The lending test evaluation is based on 2022, 2023, and 2024 HMDA lending, and 2024 small business lending. The bank's investment test performance reflects excellent qualified investment activity in this AA, including new investments (including a $500,000 equity equivalent investment supporting affordable housing and over $160,000 in donations), as well as impactful prior-period LIHTC investment dollars supporting affordable housing. The bank's service test performance reflects the bank as a leader in providing CD services. The bank's strong CD lending in this AA is also notable, with over half of the institution's CD loan dollars during the evaluation period originated in this AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ROSEBUD ASSESSMENT AREA

The bank operates one branch in this AA, which consists of Rosebud County. The branch in Ashland, Montana, offers drive-up services. The bank has not changed this AA or branch operations in this AA since the previous evaluation. The branch is located in a middle-income census tract.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ROSEBUD ASSESSMENT AREA

Examiners determined the bank’s lending, investment, and service test performances in this AA are below the performance in the full-scope non-MSA AA in the state. The bank had no material loan products and did not make CD loans in this AA during the evaluation period. The investment and service test performances reflect limited qualified investment activity and a lack of CD services.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SOUTHCENTRAL ASSESSMENT AREA

The bank operates two branches in this AA, which consists of Park and Sweet Grass counties. The branches are in Big Timber and Livingston, Montana; both offer drive-up services. The bank delineated this AA for 2024. For 2022 and 2023, these counties were part of the Non-MSA AA. The bank removed a stand-alone cash-only ATM in Livingston in November 2024. The bank has not changed branch operations in these counties since the previous evaluation. Both branches are in middle-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHCENTRAL ASSESSMENT AREA

Examiners determined the bank’s lending test performance in this AA is below the performance in the full-scope Non-MSA AA in the state. The investment and service test performances are consistent with that of the full-scope AA. The lending test evaluation is based on 2024 HMDA lending. The bank’s lending test performance reflects lower borrower and geographic distribution conclusions than in the full-scope AA. The investment and service test performances reflect limited levels of qualified investments and CD services.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TETON ASSESSMENT AREA

The bank operates two branches, in Choteau and Dutton, Montana, in this AA, which consists of Teton County. The Dutton branch offers drive-up services. The bank delineated this AA for 2024. For 2022 and 2023, this county was part of the Non-MSA AA. The bank has not changed branch operations in this county since the previous evaluation. Both branches are in middle-income census tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TETON ASSESSMENT AREA

Examiners determined the bank’s lending, investment, and service test performances in this AA are below the performance in the full-scope non-MSA AA in the state. The bank had no material loan products and did not make CD loans in this AA during the evaluation period. The investment and service test performances reflect a limited level of qualified investments and a lack of CD services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. Conclusions regarding performance of the limited-scope AAs are shown in the table below.[10]

Performance in the Limited-Scope Review Nonmetropolitan Montana AAs			
AA	***Lending Test***	***Investment Test***	***Service Test***
Fergus	Below	Below	Below
Non-MSA	Consistent	Exceeds	Exceeds
Rosebud	Below	Below	Below
Southcentral	Below	Consistent	Consistent
Teton	Below	Below	Below

[10] If the bank's performance in the limited-scope AAs impacted the overall rating(s), a brief discussion of relevant limited-scope AA information is noted in the Institution section of the report.

METROPOLITAN AREAS
LIMITED-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BOZEMAN MSA ASSESSMENT AREA

The bank operates three branches in this AA, which consists of the Bozeman MSA (Gallatin County). The branches, two in Bozeman and one in Three Forks, offer drive-up services and ATMs. This AA is new since the previous evaluation. After Gallatin County became an MSA in 2024, the bank delineated Gallatin County as the Bozeman MSA AA and removed Gallatin County from the Non-MSA AA. The bank has not changed branch operations in this AA since the AA was delineated. Two branches are in moderate-income census tracts, and one is in a middle-income tract.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BOZEMAN MSA ASSESSMENT AREA

Examiners determined the bank's lending and investment test performances in this AA are above the performance in the full-scope MSA AAs in the state, while the service test performance is consistent with that of the full-scope AAs. The lending test evaluation is based on 2024 HMDA and small business lending. The bank's lending test performance reflects the bank as a leader in CD lending, which is notable given the analysis included only 2024 and 2025 loans, and shows an excellent borrower distribution of loans. The bank's investment test performance reflects excellent qualified investment activity in this AA, particularly impactful prior-period LIHTC investment dollars supporting affordable housing.[11]

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREAT FALLS MSA ASSESSMENT AREA

The bank operates one branch in this AA, which consists of the Great Falls MSA (Cascade County). The branch is in Great Falls and offers drive-up services and an ATM. The bank has not changed this AA or branch operations in this AA since the previous evaluation. The branch is located in a moderate-income census tract near five other moderate-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREAT FALLS MSA ASSESSMENT AREA

Examiners determined the bank's lending, investment, and service test performances in this AA are consistent with the performance in the full-scope MSA AAs in the state. The lending test evaluation is based on 2022, 2023, and 2024 HMDA lending.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MISSOULA MSA ASSESSMENT AREA

The bank operates two branches in this AA, which consists of the entire Missoula MSA (Missoula and Mineral counties). Both branches are in Missoula and offer drive-up services and ATMs. The bank also operates a cash-only ATM at a non-branch location in Missoula, added in May 2023. The AA has been part of the bank's CRA AAs since the previous evaluation. Since that time, the bank opened a West Broadway Street branch in February 2025 and closed its Downtown Higgins Street branch in December

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[11] The banks' new $500,000 investment, while made in 2023 and benefited the Non-MSA AA at that time, benefited the Bozeman MSA AA starting in 2024 when the bank delineated the AA.

2023. One branch is in a middle-income census tract near four moderate-income tracts, and one is in a census tract with an unknown income designation near three moderate-income tracts; the closed Downtown branch was in a moderate-income tract. The new West Broadway Street branch, in the unknown-income census tract, is less than two miles from the closed Downtown Higgins Street branch.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MISSOULA MSA ASSESSMENT AREA

Examiners determined the bank's lending, investment, and service test performances in this AA are consistent with the performance in the full-scope MSA AAs in the state. The lending test evaluation is based on 2022, 2023, and 2024 HMDA lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN METROPOLITAN AREAS OF MONTANA

The facts and data examiners reviewed, including performance and demographic information, can be found in Appendix D accompanying this report. Conclusions regarding performance of the limited-scope AAs are shown in the table below.

Performance in the Limited-Scope Review
Metropolitan Montana AAs

AA	***Lending Test***	***Investment Test***	***Service Test***
Bozeman MSA	Above	Above	Consistent
Great Falls MSA	Consistent	Consistent	Consistent
Missoula MSA	Consistent	Consistent	Consistent

APPENDIX A

Scope of Evaluation

SCOPE OF EVALUATION FOR LENDING ACTIVITY January 1, 2022, through December 31, 2024[12]	
FINANCIAL INSTITUTION	***PRODUCTS REVIEWED***
Opportunity Bank of Montana Helena, Montana	HMDA loans Small business loans Small farm loans
AFFILIATES	***PRODUCTS REVIEWED***
Not applicable	Not applicable
SCOPE OF EVALUATION FOR COMMMUNITY DEVELOPMENT ACTIVITY October 24, 2022, through December 31, 2025	

LIST OF MONTANA ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	***TYPE OF EVALUATION***	***BRANCHES VISITED***	***OTHER INFORMATION***
Billings MSA	Full scope	None	None
Bozeman MSA	Limited scope	None	New AA in 2024- Gallatin County; county was previously part of Non-MSA AA; county designated as MSA in 2024
Fergus	Limited scope	None	None
Great Falls MSA	Limited scope	None	None
Helena MSA	Full scope	Helena	New AA in 2024- Lewis and Clark, Jefferson, and Broadwater counties; counties were previously part of Non-MSA AA; counties designated as MSA in 2024
Missoula MSA	Limited scope	None	None
Non-MSA	Limited scope	None	Composition changed after 2023 when counties were removed to form the new Helena MSA, Bozeman MSA, Southcentral, and Teton AAs- now includes four counties-Madison, Ravalli, Silver Bow, and Deer Lodge counties
Northeast Non-MSA	Full scope	None	Expanded AA in April 2022 with acquisition of branches from First Community Bank-Roosevelt and Valley counties; previously only Roosevelt County
Rosebud	Limited scope	None	None
Southcentral	Limited scope	None	New AA in 2024- Park and Sweet Grass counties; separated from Non-MSA AA
Teton	Limited scope	None	New AA in 2024- Teton County; separated from Non-MSA AA

Note: "Branches visited" indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. For this evaluation, the public file was reviewed remotely from the main office in Helena, and interviews were conducted at the Missoula branch. The evaluation of the institution's CRA performance takes into consideration activity from all branch locations, as described in the Scope of Evaluation section of the report.

[12] Examiners reviewed the bank's innovative and flexible loan program activities from October 24, 2022, through December 31, 2025.

APPENDIX B

Summary of State Ratings

State Name	*Lending Test Rating*	*Investment Test Rating*	*Service Test Rating*	*Overall State Rating*
Montana	Outstanding	Outstanding	High Satisfactory	Outstanding

APPENDIX C

Glossary of Common CRA Terms

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan statistical area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 C.F.R. 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize low- or moderate-income census tracts, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts; or (5) Neighborhood Stabilization Program (NSP)-eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and census tracts.

Consumer loan: A loan to one or more individuals for household, family, or other personal expenditures. It does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Distressed nonmetropolitan middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (i.e., approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments).

Low income: Individual income that is less than 50 percent of the area median income or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan statistical area/assessment area.

Metropolitan statistical area (MSA): An area, defined by the Office of Management and Budget, based on the concept of a core area with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle income: Individual income that is at least 80 percent and less than 120 percent of the area median income or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate income: Individual income that is at least 50 percent and less than 80 percent of the area median income or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate MSA. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate MSA, the institution will receive a rating for the multistate metropolitan area.

Small loan to business: A loan included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or classified as commercial and industrial loans.

Small loan to farm: A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland or classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income census tract: A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper income: Individual income that is more than 120 percent of the area median income or a median family income that is more than 120 percent, in the case of geography.

(For additional information, please see the Definitions sections of Regulation BB at 12 C.F.R. 28.12.)

APPENDIX D

Lending and Demographic Tables for Limited-Scope Reviews

Distribution of 2024 Home Mortgage Lending By Borrower Income Level - Table 1 of 2 Assessment Area: Bozeman MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	2.5	1.7	110	0.5	0.7	17.0
Moderate	4	10.0	8.1	1,449	6.9	4.1	19.4
Middle	9	22.5	17.6	4,286	20.5	12.2	24.9
Upper	20	50.0	52.0	10,149	48.6	62.1	38.7
Unknown	6	15.0	20.6	4,897	23.4	20.8	0.0
Total	40	100.0	100.0	20,891	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.9	0	0.0	1.8	17.0
Moderate	1	10.0	11.9	50	2.3	5.6	19.4
Middle	2	20.0	15.4	360	16.8	10.3	24.9
Upper	5	50.0	46.0	775	36.1	50.3	38.7
Unknown	2	20.0	22.8	960	44.8	32.0	0.0
Total	10	100.0	100.0	2,145	100.0	100.0	100.0
Home Improvement Loans							
Low	2	10.5	4.8	155	9.6	2.5	17.0
Moderate	5	26.3	12.2	365	22.7	5.2	19.4
Middle	4	21.1	21.3	240	14.9	16.5	24.9
Upper	8	42.1	54.8	850	52.8	67.9	38.7
Unknown	0	0.0	6.9	0	0.0	8.0	0.0
Total	19	100.0	100.0	1,610	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	3.4	2.6	265	1.0	1.1	17.0
Moderate	13	14.9	9.7	2,114	7.9	4.5	19.4
Middle	22	25.3	17.8	5,351	20.0	11.9	24.9
Upper	41	47.1	50.8	13,187	49.3	60.3	38.7
Unknown	8	9.2	19.1	5,857	21.9	22.2	0.0
Total	87	100.0	100.0	26,774	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level - Table 2 of 2 Assessment Area: Bozeman MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	4.6	0	0.0	2.9	17.0
Moderate	3	16.7	12.2	250	11.7	4.2	19.4
Middle	7	38.9	21.4	465	21.9	9.9	24.9
Upper	8	44.4	54.2	1,413	66.4	73.1	38.7
Unknown	0	0.0	7.6	0	0.0	9.9	0.0
Total	18	100.0	100.0	2,128	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	3.7	0	0.0	2.0	17.0
Moderate	0	0.0	16.8	0	0.0	6.2	19.4
Middle	0	0.0	22.4	0	0.0	12.6	24.9
Upper	0	0.0	45.8	0	0.0	71.1	38.7
Unknown	0	0.0	11.2	0	0.0	8.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	17.0
Moderate	0	0.0	0.0	0	0.0	0.0	19.4
Middle	0	0.0	0.0	0	0.0	0.0	24.9
Upper	0	0.0	0.0	0	0.0	0.0	38.7
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Bozeman MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	50	56.2	49.8	7,478	36.5	32.7	92.4
Over $1 Million	39	43.8		13,007	63.5		6.6
Revenue Unknown	0	0.0		0	0.0		1.0
Total	89	100.0		20,485	100.0		100.0
By Loan Size							
$100,000 or Less	41	46.1	92.6	2,074	10.1	40.6	
$100,001 - $250,000	17	19.1	4.2	3,004	14.7	17.0	
$250,001 - $1 Million	31	34.8	3.2	15,407	75.2	42.4	
Total	89	100.0	100.0	20,485	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	29	58.0		1,297	17.3		
$100,001 - $250,000	10	20.0		1,660	22.2		
$250,001 - $1 Million	11	22.0		4,521	60.5		
Total	50	100.0		7,478	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Bozeman MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.4	0	0.0	0.2	0.1
Moderate	2	5.0	5.7	1,031	4.9	4.1	6.7
Middle	33	82.5	74.1	17,466	83.6	64.0	69.5
Upper	5	12.5	19.9	2,394	11.5	31.6	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	40	100.0	100.0	20,891	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.2	0	0.0	0.1	0.1
Moderate	0	0.0	4.3	0	0.0	2.7	6.7
Middle	5	50.0	69.9	1,275	59.4	56.7	69.5

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Bozeman MSA							
Upper	5	50.0	25.6	870	40.6	40.5	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	2,145	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	2	10.5	6.4	130	8.1	4.2	6.7
Middle	14	73.7	73.9	1,255	78.0	71.0	69.5
Upper	3	15.8	19.7	225	14.0	24.8	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	1,610	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	11.1
Moderate	0	0.0	16.7	0	0.0	34.1	21.0
Middle	0	0.0	50.0	0	0.0	52.5	58.9
Upper	0	0.0	33.3	0	0.0	13.4	9.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	0.3	0	0.0	0.2	0.1
Moderate	4	4.6	5.5	1,161	4.3	5.5	6.7
Middle	68	78.2	73.1	21,524	80.4	61.5	69.5
Upper	15	17.2	21.2	4,089	15.3	32.9	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	87	100.0	100.0	26,774	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Bozeman MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	4.6	0	0.0	9.5	6.7
Middle	16	88.9	72.5	1,528	71.8	57.3	69.5
Upper	2	11.1	22.9	600	28.2	33.2	23.7

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Bozeman MSA							
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,128	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	6.5	0	0.0	5.1	6.7
Middle	0	0.0	74.8	0	0.0	36.8	69.5
Upper	0	0.0	18.7	0	0.0	58.1	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.1
Moderate	0	0.0	0.0	0	0.0	0.0	6.7
Middle	0	0.0	100.0	0	0.0	100.0	69.5
Upper	0	0.0	0.0	0	0.0	0.0	23.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Bozeman MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	1	1.1	0.6	150	0.7	0.4	0.9
Moderate	9	10.1	9.9	2,575	12.6	10.0	14.0
Middle	71	79.8	66.0	16,207	79.1	63.1	61.6
Upper	8	9.0	22.6	1,553	7.6	26.3	23.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.9	0	0.0	0.2	
Total	89	100.0	100.0	20,485	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Bozeman MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.8	461	1.8	70	15.2	4,456	17.0
Moderate	4	15.4	1,764	6.7	231	13.1	5,084	19.4
Middle	16	61.5	18,350	69.9	659	3.6	6,544	24.9
Upper	5	19.2	5,663	21.6	121	2.1	10,154	38.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**26**	**100.0**	**26,238**	**100.0**	**1,081**	**4.1**	**26,238**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,267	18	0.1	1.4	1,158	91.4	91	7.2
Moderate	6,414	1,869	6.7	29.1	3,198	49.9	1,347	21.0
Middle	32,783	19,250	69.5	58.7	11,438	34.9	2,095	6.4
Upper	10,547	6,556	23.7	62.2	1,800	17.1	2,191	20.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**51,011**	**27,693**	**100.0**	**54.3**	**17,594**	**34.5**	**5,724**	**11.2**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	68	0.9	59	0.8	7	1.3	2	2.5
Moderate	1,104	14.0	989	13.6	102	19.4	13	16.5
Middle	4,867	61.6	4,501	61.7	318	60.6	48	60.8
Upper	1,857	23.5	1,743	23.9	98	18.7	16	20.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**7,896**	**100.0**	**7,292**	**100.0**	**525**	**100.0**	**79**	**100.0**
Percentage of Total Businesses:				**92.4**		**6.6**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	5.9	16	6.0	0	0.0	0	0.0
Middle	174	64.4	173	64.6	1	50.0	0	0.0

2024 Bozeman MSA AA Demographics								
Upper	80	29.6	79	29.5	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**270**	**100.0**	**268**	**100.0**	**2**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.3**		**0.7**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Revenue Size of Farms Assessment Area: Fergus County							
	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	41	91.1	82.6	6,674	88.0	90.5	99.0
Over $1 Million	4	8.9		910	12.0		0.5
Revenue Unknown	0	0.0		0	0.0		0.5
Total	45	100.0		7,584	100.0		100.0
By Loan Size							
$100,000 or Less	17	37.8	64.5	863	11.4	21.1	
$100,001 - $250,000	17	37.8	19.7	2,767	36.5	29.4	
$250,001 - $500,000	11	24.4	15.8	3,954	52.1	49.5	
Total	45	100.0	100.0	7,584	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	17	41.5		863	12.9		
$100,001 - $250,000	14	34.1		2,257	33.8		
$250,001 - $500,000	10	24.4		3,554	53.3		
Total	41	100.0		6,674	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Farm Lending By Income Level of Geography Assessment Area: Fergus County							
Geographic Income Level	Bank And Aggregate Loans						Total Farms %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.9	0	0.0	0.7	4.3
Middle	0	0.0	3.9	0	0.0	1.0	2.4
Upper	45	100.0	93.9	7,584	100.0	98.3	93.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	
Total	45	100.0	100.0	7,584	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Fergus County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	478	17.1
Moderate	1	33.3	723	25.9	115	15.9	458	16.4
Middle	1	33.3	576	20.7	67	11.6	602	21.6
Upper	1	33.3	1,489	53.4	84	5.6	1,250	44.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**2,788**	**100.0**	**266**	**9.5**	**2,788**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,687	1,063	29.8	63.0	574	34.0	50	3.0
Middle	1,569	996	27.9	63.5	413	26.3	160	10.2
Upper	2,643	1,505	42.2	56.9	506	19.1	632	23.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**5,899**	**3,564**	**100.0**	**60.4**	**1,493**	**25.3**	**842**	**14.3**

2024 Fergus County AA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	167	29.3	154	29.7	12	31.6	1	7.7
Middle	111	19.5	99	19.1	11	28.9	1	7.7
Upper	292	51.2	266	51.3	15	39.5	11	84.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**570**	**100.0**	**519**	**100.0**	**38**	**100.0**	**13**	**100.0**
Percentage of Total Businesses:				**91.1**		**6.7**		**2.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	9	4.3	9	4.3	0	0.0	0	0.0
Middle	5	2.4	5	2.4	0	0.0	0	0.0
Upper	195	93.3	193	93.2	1	100.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**209**	**100.0**	**207**	**100.0**	**1**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**99.0**		**0.5**		**0.5**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Great Falls MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	4	2.5	2.5	593	1.5	1.1	20.6
Moderate	52	33.1	16.8	10,582	25.9	11.6	18.4
Middle	36	22.9	23.4	8,199	20.1	20.8	20.6
Upper	58	36.9	30.4	20,354	49.9	37.5	40.4
Unknown	7	4.5	26.8	1,099	2.7	29.0	0.0
Total	157	100.0	100.0	40,827	100.0	100.0	100.0
Refinance Loans							
Low	1	7.1	5.7	122	3.6	2.5	20.6
Moderate	2	14.3	16.2	355	10.3	10.2	18.4
Middle	4	28.6	19.4	688	20.1	14.1	20.6
Upper	6	42.9	30.5	2,030	59.2	35.3	40.4
Unknown	1	7.1	28.1	236	6.9	37.9	0.0
Total	14	100.0	100.0	3,431	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.4	0	0.0	3.5	20.6
Moderate	1	5.6	13.3	30	2.5	9.5	18.4
Middle	5	27.8	15.6	212	17.7	10.9	20.6
Upper	10	55.6	55.6	669	55.8	62.6	40.4
Unknown	2	11.1	8.1	287	24.0	13.5	0.0
Total	18	100.0	100.0	1,198	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	7	3.4	4.0	875	1.8	1.6	20.6
Moderate	60	29.1	16.8	11,465	24.0	11.4	18.4
Middle	46	22.3	22.0	9,159	19.2	19.0	20.6
Upper	83	40.3	33.1	24,667	51.6	37.9	40.4
Unknown	10	4.9	24.1	1,622	3.4	30.0	0.0
Total	206	100.0	100.0	47,788	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Great Falls MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	4.9	0	0.0	5.2	20.6
Moderate	4	33.3	23.0	254	15.9	19.4	18.4
Middle	1	8.3	14.8	60	3.8	9.3	20.6
Upper	7	58.3	52.5	1,286	80.4	62.2	40.4
Unknown	0	0.0	4.9	0	0.0	4.0	0.0
Total	12	100.0	100.0	1,600	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	2	40.0	8.4	160	21.9	6.3	20.6
Moderate	1	20.0	20.0	244	33.3	15.3	18.4
Middle	0	0.0	30.5	0	0.0	26.6	20.6
Upper	2	40.0	38.9	328	44.8	50.5	40.4
Unknown	0	0.0	2.1	0	0.0	1.4	0.0
Total	5	100.0	100.0	732	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	20.6
Moderate	0	0.0	0.0	0	0.0	0.0	18.4
Middle	0	0.0	0.0	0	0.0	0.0	20.6
Upper	0	0.0	0.0	0	0.0	0.0	40.4
Unknown	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Great Falls MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	17	7.2	3.4	2,151	4.1	1.6	17	14.3	3.8	2,318	8.1	1.9	20.6
Moderate	59	25.0	16.0	9,846	18.5	11.0	29	24.4	20.4	5,812	20.3	14.9	18.4
Middle	60	25.4	26.1	12,969	24.4	22.2	25	21.0	25.9	5,176	18.1	23.7	20.6
Upper	96	40.7	34.2	27,657	52.1	42.7	46	38.7	28.8	14,827	51.8	36.8	40.4
Unknown	4	1.7	20.3	465	0.9	22.5	2	1.7	21.1	508	1.8	22.8	0.0
Total	236	100.0	100.0	53,088	100.0	100.0	119	100.0	100.0	28,641	100.0	100.0	100.0
Refinance Loans													
Low	4	12.5	8.9	502	6.7	5.0	1	10.0	7.4	69	3.0	3.9	20.6
Moderate	7	21.9	20.0	1,116	14.9	14.8	0	0.0	18.9	0	0.0	11.6	18.4
Middle	11	34.4	21.0	2,491	33.3	19.7	3	30.0	29.0	280	12.2	26.0	20.6
Upper	8	25.0	34.2	3,077	41.1	41.2	6	60.0	29.3	1,947	84.8	35.2	40.4
Unknown	2	6.3	15.9	297	4.0	19.3	0	0.0	15.3	0	0.0	23.2	0.0
Total	32	100.0	100.0	7,483	100.0	100.0	10	100.0	100.0	2,296	100.0	100.0	100.0
Home Improvement Loans													
Low	1	6.7	5.0	107	9.3	3.6	3	12.5	10.1	135	9.9	8.1	20.6
Moderate	3	20.0	15.0	139	12.0	10.8	4	16.7	20.1	157	11.6	13.7	18.4
Middle	1	6.7	16.7	79	6.8	14.4	4	16.7	20.1	179	13.2	16.8	20.6
Upper	8	53.3	55.8	534	46.2	60.3	12	50.0	43.9	825	60.7	54.7	40.4
Unknown	2	13.3	7.5	297	25.7	11.0	1	4.2	5.8	63	4.6	6.7	0.0
Total	15	100.0	100.0	1,156	100.0	100.0	24	100.0	100.0	1,359	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	22	7.7	5.2	2,760	4.5	2.6	23	14.0	5.4	2,682	8.0	2.5	20.6
Moderate	69	24.2	17.3	11,101	17.9	12.1	35	21.3	19.8	6,059	18.2	14.3	18.4
Middle	73	25.6	23.6	15,614	25.2	21.2	33	20.1	26.0	5,869	17.6	23.8	20.6
Upper	113	39.6	35.5	31,368	50.7	42.7	70	42.7	30.8	18,144	54.4	37.2	40.4
Unknown	8	2.8	18.4	1,059	1.7	21.4	3	1.8	18.0	571	1.7	22.2	0.0
Total	285	100.0	100.0	61,902	100.0	100.0	164	100.0	100.0	33,325	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Great Falls MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	6.4	0	0.0	7.3	2	25.0	12.2	160	32.6	10.9	20.6
Moderate	0	0.0	17.0	0	0.0	13.1	2	25.0	16.3	90	18.3	10.5	18.4
Middle	1	50.0	14.9	75	42.9	12.8	0	0.0	22.4	0	0.0	13.8	20.6
Upper	1	50.0	48.9	100	57.1	58.2	4	50.0	44.9	241	49.1	59.4	40.4
Unknown	0	0.0	12.8	0	0.0	8.7	0	0.0	4.1	0	0.0	5.4	0.0
Total	2	100.0	100.0	175	100.0	100.0	8	100.0	100.0	491	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.2	0	0.0	2.1	0	0.0	9.2	0	0.0	8.9	20.6
Moderate	0	0.0	23.8	0	0.0	22.5	0	0.0	16.9	0	0.0	14.9	18.4
Middle	0	0.0	19.0	0	0.0	9.3	1	33.3	27.7	234	43.5	25.7	20.6
Upper	0	0.0	46.0	0	0.0	57.1	2	66.7	43.1	304	56.5	46.9	40.4
Unknown	0	0.0	7.9	0	0.0	9.1	0	0.0	3.1	0	0.0	3.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	538	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.6
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.4
Middle	0	0.0	6.7	0	0.0	12.7	0	0.0	0.0	0	0.0	0.0	20.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	40.4
Unknown	0	0.0	93.3	0	0.0	87.3	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Great Falls MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	40	25.5	19.3	8,774	21.5	14.6	14.3
Middle	96	61.1	58.2	25,066	61.4	55.5	64.6

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Great Falls MSA							
Upper	21	13.4	22.5	6,987	17.1	29.8	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	157	100.0	100.0	40,827	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	28.6	15.0	658	19.2	12.4	14.3
Middle	7	50.0	63.4	1,554	45.3	61.2	64.6
Upper	3	21.4	21.6	1,219	35.5	26.4	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	3,431	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	27.8	17.8	337	28.1	17.3	14.3
Middle	8	44.4	62.2	421	35.1	55.9	64.6
Upper	5	27.8	20.0	440	36.7	26.8	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	1,198	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	47.8	953	29.4	25.1	38.6
Middle	1	25.0	34.8	1,154	35.7	70.5	54.9
Upper	2	50.0	17.4	1,130	34.9	4.4	6.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	3,237	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	50	23.8	17.8	10,722	21.0	15.0	14.3
Middle	123	58.6	59.6	29,737	58.3	58.1	64.6
Upper	37	17.6	22.6	10,566	20.7	26.9	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	210	100.0	100.0	51,025	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Great Falls MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	3.3	0	0.0	1.6	14.3
Middle	6	50.0	63.9	810	50.6	64.9	64.6
Upper	6	50.0	32.8	790	49.4	33.6	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,600	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	15.8	0	0.0	10.8	14.3
Middle	5	100.0	56.8	732	100.0	51.3	64.6
Upper	0	0.0	27.4	0	0.0	37.9	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	732	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	14.3
Middle	0	0.0	100.0	0	0.0	100.0	64.6
Upper	0	0.0	0.0	0	0.0	0.0	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Great Falls MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	57	24.2	17.3	9,838	18.5	12.6	30	25.2	20.4	5,592	19.5	16.2	14.3
Middle	137	58.1	63.0	29,952	56.4	60.4	79	66.4	58.0	19,212	67.1	55.9	64.6
Upper	42	17.8	19.7	13,298	25.0	27.0	10	8.4	21.6	3,837	13.4	27.9	21.1

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Great Falls MSA

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	236	100.0	100.0	53,088	100.0	100.0	119	100.0	100.0	28,641	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	21.9	17.0	1,115	14.9	13.2	2	20.0	16.2	335	14.6	12.8	14.3
Middle	22	68.8	60.8	5,107	68.2	59.8	6	60.0	62.2	1,374	59.8	60.3	64.6
Upper	3	9.4	22.2	1,261	16.9	27.1	2	20.0	21.6	587	25.6	26.9	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	32	100.0	100.0	7,483	100.0	100.0	10	100.0	100.0	2,296	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	26.7	21.7	423	36.6	20.7	8	33.3	18.0	348	25.6	14.7	14.3
Middle	7	46.7	52.5	443	38.3	48.0	14	58.3	62.6	906	66.7	62.3	64.6
Upper	4	26.7	25.8	290	25.1	31.3	2	8.3	19.4	105	7.7	23.1	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	1,156	100.0	100.0	24	100.0	100.0	1,359	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	50.0	64.3	1,253	23.0	43.0	1	50.0	55.0	265	51.5	43.4	38.6
Middle	4	50.0	35.7	4,187	77.0	57.0	1	50.0	40.0	250	48.5	56.5	54.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	5.0	0	0.0	0.1	6.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	5,440	100.0	100.0	2	100.0	100.0	515	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	72	24.6	17.7	12,629	18.8	14.1	44	26.5	19.5	6,890	20.4	17.5	14.3
Middle	171	58.4	61.2	39,764	59.0	59.7	104	62.7	58.8	22,011	65.0	56.8	64.6
Upper	50	17.1	21.0	14,949	22.2	26.2	18	10.8	21.7	4,939	14.6	25.7	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	293	100.0	100.0	67,342	100.0	100.0	166	100.0	100.0	33,840	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: Great Falls MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.8	0	0.0	12.2	2	25.0	16.3	75	15.3	7.6	14.3
Middle	1	50.0	48.9	75	42.9	35.1	3	37.5	51.0	240	48.9	48.6	64.6
Upper	1	50.0	38.3	100	57.1	52.6	3	37.5	32.7	176	35.8	43.8	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	175	100.0	100.0	8	100.0	100.0	491	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	11.1	0	0.0	6.8	1	33.3	16.9	275	51.1	17.4	14.3
Middle	0	0.0	60.3	0	0.0	52.0	1	33.3	55.4	29	5.4	57.9	64.6
Upper	0	0.0	28.6	0	0.0	41.2	1	33.3	27.7	234	43.5	24.7	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	538	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.0	0	0.0	13.1	0	0.0	0.0	0	0.0	0.0	14.3
Middle	0	0.0	66.7	0	0.0	64.5	0	0.0	100.0	0	0.0	100.0	64.6
Upper	0	0.0	13.3	0	0.0	22.3	0	0.0	0.0	0	0.0	0.0	21.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Great Falls MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,317	20.6
Moderate	7	28.0	3,913	18.7	744	19.0	3,854	18.4
Middle	15	60.0	12,898	61.6	994	7.7	4,309	20.6
Upper	3	12.0	4,122	19.7	100	2.4	8,453	40.4

2024 Great Falls MSA AA Demographics								
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**25**	**100.0**	**20,933**	**100.0**	**1,838**	**8.8**	**20,933**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	8,946	3,280	14.3	36.7	4,413	49.3	1,253	14.0
Middle	24,479	14,806	64.6	60.5	6,608	27.0	3,065	12.5
Upper	5,587	4,842	21.1	86.7	491	8.8	254	4.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**39,012**	**22,928**	**100.0**	**58.8**	**11,512**	**29.5**	**4,572**	**11.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,139	32.5	1,020	32.1	109	38.0	10	24.4
Middle	1,977	56.4	1,787	56.3	162	56.4	28	68.3
Upper	388	11.1	369	11.6	16	5.6	3	7.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3,504**	**100.0**	**3,176**	**100.0**	**287**	**100.0**	**41**	**100.0**
Percentage of Total Businesses:				**90.6**		**8.2**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	13	5.6	12	5.2	1	25.0	0	0.0
Middle	200	85.5	197	86.0	3	75.0	0	0.0
Upper	21	9.0	20	8.7	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**234**	**100.0**	**229**	**100.0**	**4**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.9**		**1.7**		**0.4**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Missoula MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	1.4	0	0.0	0.4	17.6
Moderate	4	4.1	8.7	1,138	2.6	4.6	20.0
Middle	23	23.7	18.4	8,309	19.3	14.5	21.7
Upper	65	67.0	48.4	31,374	72.8	56.0	40.7
Unknown	5	5.2	23.1	2,257	5.2	24.5	0.0
Total	97	100.0	100.0	43,078	100.0	100.0	100.0
Refinance Loans							
Low	1	5.3	4.1	110	2.2	2.8	17.6
Moderate	2	10.5	12.6	532	10.8	7.7	20.0
Middle	3	15.8	17.2	536	10.9	12.5	21.7
Upper	11	57.9	42.8	2,903	58.8	45.5	40.7
Unknown	2	10.5	23.3	855	17.3	31.6	0.0
Total	19	100.0	100.0	4,936	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.1	0	0.0	1.9	17.6
Moderate	5	22.7	10.2	343	22.2	6.1	20.0
Middle	4	18.2	26.9	295	19.1	19.7	21.7
Upper	12	54.5	50.7	812	52.6	64.3	40.7
Unknown	1	4.5	8.2	95	6.1	8.0	0.0
Total	22	100.0	100.0	1,545	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	0.7	2.6	110	0.2	1.0	17.6
Moderate	13	8.8	10.2	2,311	4.5	5.5	20.0
Middle	30	20.4	19.7	9,140	17.9	14.3	21.7
Upper	95	64.6	47.9	36,315	71.1	54.6	40.7
Unknown	8	5.4	19.6	3,207	6.3	24.6	0.0
Total	147	100.0	100.0	51,083	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Missoula MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	3.8	0	0.0	1.9	17.6
Moderate	0	0.0	7.5	0	0.0	3.9	20.0
Middle	0	0.0	18.9	0	0.0	11.0	21.7
Upper	7	100.0	63.2	1,226	100.0	74.9	40.7
Unknown	0	0.0	6.6	0	0.0	8.3	0.0
Total	7	100.0	100.0	1,226	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	2.8	0	0.0	1.4	17.6
Moderate	2	100.0	19.3	298	100.0	12.2	20.0
Middle	0	0.0	28.4	0	0.0	17.4	21.7
Upper	0	0.0	45.0	0	0.0	62.9	40.7
Unknown	0	0.0	4.6	0	0.0	6.1	0.0
Total	2	100.0	100.0	298	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	50.0	0	0.0	58.6	17.6
Moderate	0	0.0	0.0	0	0.0	0.0	20.0
Middle	0	0.0	0.0	0	0.0	0.0	21.7
Upper	0	0.0	0.0	0	0.0	0.0	40.7
Unknown	0	0.0	50.0	0	0.0	41.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Missoula MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	0.8	1.5	100	0.2	0.7	4	4.1	2.8	748	1.9	1.0	17.5
Moderate	12	10.1	8.8	3,705	8.3	5.1	14	14.3	11.8	3,804	9.5	7.0	20.1
Middle	22	18.5	19.2	7,284	16.2	14.8	17	17.3	21.2	6,417	16.0	18.0	21.9

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Missoula MSA

Upper	80	67.2	57.2	32,519	72.5	64.2	58	59.2	42.6	27,476	68.6	52.0	40.5
Unknown	4	3.4	13.2	1,221	2.7	15.2	5	5.1	21.7	1,604	4.0	22.1	0.0
Total	119	100.0	100.0	44,829	100.0	100.0	98	100.0	100.0	40,049	100.0	100.0	100.0
Refinance Loans													
Low	2	3.7	7.6	438	2.8	4.1	0	0.0	5.7	0	0.0	2.8	17.5
Moderate	14	25.9	16.3	3,170	20.1	11.4	2	22.2	19.6	260	17.1	14.0	20.1
Middle	14	25.9	22.9	3,368	21.4	18.9	4	44.4	25.3	958	63.2	19.2	21.9
Upper	23	42.6	41.5	8,529	54.2	46.3	2	22.2	35.2	200	13.2	43.3	40.5
Unknown	1	1.9	11.8	240	1.5	19.4	1	11.1	14.2	99	6.5	20.6	0.0
Total	54	100.0	100.0	15,745	100.0	100.0	9	100.0	100.0	1,517	100.0	100.0	100.0
Home Improvement Loans													
Low	1	2.6	3.6	50	1.5	2.0	2	7.4	5.0	70	3.8	4.6	17.5
Moderate	4	10.3	11.5	260	8.0	9.2	5	18.5	18.9	214	11.6	10.7	20.1
Middle	6	15.4	21.8	690	21.3	16.8	8	29.6	31.2	346	18.7	24.7	21.9
Upper	26	66.7	60.2	2,135	65.9	68.1	12	44.4	40.9	1,220	65.9	55.0	40.5
Unknown	2	5.1	3.0	105	3.2	4.0	0	0.0	4.0	0	0.0	4.9	0.0
Total	39	100.0	100.0	3,240	100.0	100.0	27	100.0	100.0	1,850	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	4	1.8	3.8	588	0.9	1.9	6	4.3	4.0	818	1.8	1.5	17.5
Moderate	30	13.8	11.8	7,135	11.1	7.1	22	15.8	14.5	4,378	9.9	8.3	20.1
Middle	42	19.4	20.6	11,342	17.6	16.0	31	22.3	23.9	8,330	18.8	18.5	21.9
Upper	134	61.8	52.9	43,772	68.0	59.5	74	53.2	40.7	29,109	65.7	51.0	40.5
Unknown	7	3.2	10.8	1,566	2.4	15.5	6	4.3	16.9	1,703	3.8	20.8	0.0
Total	217	100.0	100.0	64,403	100.0	100.0	139	100.0	100.0	44,338	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Missoula MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	3.1	0	0.0	2.7	0	0.0	2.3	0	0.0	1.6	17.5
Moderate	0	0.0	10.9	0	0.0	4.3	1	33.3	17.4	100	22.2	8.9	20.1
Middle	0	0.0	17.2	0	0.0	13.1	1	33.3	29.1	250	55.6	23.5	21.9
Upper	5	100.0	60.2	589	100.0	72.1	1	33.3	37.2	100	22.2	49.3	40.5
Unknown	0	0.0	8.6	0	0.0	7.8	0	0.0	14.0	0	0.0	16.6	0.0

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Missoula MSA													
Total	5	100.0	100.0	589	100.0	100.0	3	100.0	100.0	450	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	4.9	0	0.0	7.8	0	0.0	11.2	0	0.0	4.5	17.5
Moderate	0	0.0	19.5	0	0.0	6.9	0	0.0	16.8	0	0.0	13.9	20.1
Middle	0	0.0	19.5	0	0.0	9.3	1	100.0	29.0	359	100.0	18.4	21.9
Upper	0	0.0	54.9	0	0.0	73.5	0	0.0	38.3	0	0.0	54.4	40.5
Unknown	0	0.0	1.2	0	0.0	2.5	0	0.0	4.7	0	0.0	8.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	359	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1	0.9	0.0	17.5
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.1
Middle	0	0.0	14.3	0	0.0	13.4	0	0.0	0.0	0	0.0	0.0	21.9
Upper	0	0.0	0.0	0	0.0	0.0	1	100.0	25.0	0	0.0	25.9	40.5
Unknown	0	0.0	85.7	0	0.0	86.6	0	0.0	75.0	0	0.0	74.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	113	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Missoula MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	14	14.4	18.0	4,571	10.6	15.9	17.1
Middle	46	47.4	46.3	19,608	45.5	45.2	48.7
Upper	35	36.1	33.6	17,685	41.1	37.6	33.2
Unknown	2	2.1	2.1	1,214	2.8	1.3	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	97	100.0	100.0	43,078	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	21.1	18.6	670	13.6	15.8	17.1
Middle	9	47.4	44.4	2,709	54.9	41.3	48.7
Upper	6	31.6	36.6	1,557	31.5	42.7	33.2
Unknown	0	0.0	0.4	0	0.0	0.2	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	4,936	100.0	100.0	100.0

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Missoula MSA

Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	18.2	14.3	303	19.6	12.3	17.1
Middle	11	50.0	54.1	805	52.1	52.5	48.7
Upper	7	31.8	31.3	437	28.3	35.1	33.2
Unknown	0	0.0	0.3	0	0.0	0.2	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	1,545	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.3	0	0.0	2.4	22.0
Middle	0	0.0	60.0	0	0.0	40.0	49.9
Upper	0	0.0	20.0	0	0.0	49.8	19.3
Unknown	0	0.0	6.7	0	0.0	7.8	8.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	23	15.6	17.5	5,769	11.3	13.9	17.1
Middle	69	46.9	46.3	23,576	46.2	43.7	48.7
Upper	53	36.1	34.9	20,524	40.2	40.5	33.2
Unknown	2	1.4	1.3	1,214	2.4	1.9	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	147	100.0	100.0	51,083	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Missoula MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	14.3	11.3	225	18.4	10.9	17.1
Middle	1	14.3	40.6	156	12.7	37.0	48.7
Upper	5	71.4	48.1	845	68.9	52.1	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,226	100.0	100.0	100.0

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Missoula MSA

Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	22.0	0	0.0	19.0	17.1
Middle	2	100.0	38.5	298	100.0	30.5	48.7
Upper	0	0.0	39.4	0	0.0	50.6	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	298	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	50.0	0	0.0	41.4	17.1
Middle	0	0.0	0.0	0	0.0	0.0	48.7
Upper	0	0.0	50.0	0	0.0	58.6	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Missoula MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	23	19.3	16.1	7,287	16.3	13.6	12	12.2	14.3	3,478	8.7	11.9	12.9
Middle	59	49.6	49.9	22,638	50.5	47.4	40	40.8	46.8	14,957	37.3	44.6	51.2
Upper	34	28.6	32.3	14,039	31.3	37.9	46	46.9	37.3	21,614	54.0	42.7	34.9
Unknown	3	2.5	1.6	865	1.9	1.1	0	0.0	1.6	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	119	100.0	100.0	44,829	100.0	100.0	98	100.0	100.0	40,049	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	13.0	13.3	1,506	9.6	10.6	0	0.0	9.9	0	0.0	10.0	12.9
Middle	34	63.0	52.1	10,900	69.2	52.4	4	44.4	47.0	867	57.2	44.6	51.2
Upper	13	24.1	34.0	3,339	21.2	36.6	5	55.6	41.6	650	42.8	44.0	34.9
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	1.5	0	0.0	1.4	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	54	100.0	100.0	15,745	100.0	100.0	9	100.0	100.0	1,517	100.0	100.0	100.0

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Missoula MSA													
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	5	12.8	13.9	250	7.7	10.9	2	7.4	11.3	115	6.2	12.4	12.9
Middle	20	51.3	49.2	1,948	60.1	49.1	14	51.9	49.8	1,161	62.8	43.0	51.2
Upper	13	33.3	36.1	1,012	31.2	39.5	10	37.0	38.5	544	29.4	44.5	34.9
Unknown	1	2.6	0.8	30	0.9	0.5	1	3.7	0.3	30	1.6	0.1	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	3,240	100.0	100.0	27	100.0	100.0	1,850	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	12.5	0	0.0	8.1	0	0.0	7.1	0	0.0	3.8	21.3
Middle	0	0.0	62.5	0	0.0	78.3	0	0.0	64.3	0	0.0	42.3	50.3
Upper	0	0.0	21.9	0	0.0	11.5	0	0.0	7.1	0	0.0	11.2	19.4
Unknown	0	0.0	3.1	0	0.0	2.1	1	100.0	21.4	1,500	100.0	42.7	9.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	1,500	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	35	16.1	15.0	9,043	14.0	12.1	14	10.0	12.8	3,593	7.8	11.2	12.9
Middle	116	53.5	49.9	35,745	55.5	52.2	60	42.9	48.1	17,444	38.1	44.8	51.2
Upper	62	28.6	34.1	18,720	29.1	34.7	63	45.0	37.4	23,158	50.5	41.4	34.9
Unknown	4	1.8	1.1	895	1.4	1.0	3	2.1	1.7	1,643	3.6	2.6	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	217	100.0	100.0	64,403	100.0	100.0	140	100.0	100.0	45,838	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Missoula MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.9	0	0.0	11.4	0	0.0	14.0	0	0.0	10.1	12.9
Middle	3	60.0	42.2	259	44.0	41.8	1	33.3	48.8	100	22.2	40.5	51.2
Upper	2	40.0	46.1	330	56.0	46.8	2	66.7	33.7	350	77.8	47.7	34.9
Unknown	0	0.0	0.8	0	0.0	0.1	0	0.0	3.5	0	0.0	1.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	589	100.0	100.0	3	100.0	100.0	450	100.0	100.0	100.0

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Missoula MSA

Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	26.8	0	0.0	16.8	0	0.0	8.4	0	0.0	6.6	12.9
Middle	0	0.0	32.9	0	0.0	40.2	1	100.0	60.7	359	100.0	64.0	51.2
Upper	0	0.0	40.2	0	0.0	43.0	0	0.0	29.0	0	0.0	28.8	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.9	0	0.0	0.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	359	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	28.6	0	0.0	31.3	0	0.0	0.0	0	0.0	0.0	12.9
Middle	0	0.0	42.9	0	0.0	54.8	0	0.0	50.0	0	0.0	73.9	51.2
Upper	0	0.0	28.6	0	0.0	13.9	0	0.0	25.0	0	0.0	0.2	34.9
Unknown	0	0.0	0.0	0	0.0	0.0	1	100.0	25.0	113	100.0	25.9	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	113	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Missoula MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	5,069	17.6
Moderate	7	22.6	4,697	16.3	451	9.6	5,772	20.0
Middle	16	51.6	13,830	48.0	831	6.0	6,260	21.7
Upper	7	22.6	9,618	33.4	419	4.4	11,731	40.7
Unknown	1	3.2	687	2.4	114	16.6	0	0.0
Total AA	**31**	**100.0**	**28,832**	**100.0**	**1,815**	**6.3**	**28,832**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,710	5,238	17.1	44.7	4,386	37.5	2,086	17.8
Middle	28,539	14,897	48.7	52.2	11,093	38.9	2,549	8.9
Upper	15,163	10,162	33.2	67.0	4,268	28.1	733	4.8
Unknown	1,823	312	1.0	17.1	1,270	69.7	241	13.2
Total AA	**57,235**	**30,609**	**100.0**	**53.5**	**21,017**	**36.7**	**5,609**	**9.8**

2024 Missoula MSA AA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,569	23.4	1,434	23.2	117	25.5	18	26.9
Middle	3,005	44.8	2,806	45.4	176	38.3	23	34.3
Upper	1,846	27.5	1,710	27.6	111	24.2	25	37.3
Unknown	291	4.3	235	3.8	55	12.0	1	1.5
Total AA	**6,711**	**100.0**	**6,185**	**100.0**	**459**	**100.0**	**67**	**100.0**
Percentage of Total Businesses:				**92.2**		**6.8**		**1.0**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	46	22.5	45	22.7	1	16.7	0	0.0
Middle	92	45.1	90	45.5	2	33.3	0	0.0
Upper	64	31.4	61	30.8	3	50.0	0	0.0
Unknown	2	1.0	2	1.0	0	0.0	0	0.0
Total AA	**204**	**100.0**	**198**	**100.0**	**6**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.1**		**2.9**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Non-MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	3	4.3	1.9	285	1.2	0.5	19.2
Moderate	5	7.2	10.5	703	2.9	4.2	18.2
Middle	22	31.9	19.9	5,344	22.4	11.6	24.0
Upper	36	52.2	46.8	15,477	64.7	52.3	38.6
Unknown	3	4.3	20.9	2,094	8.8	31.4	0.0
Total	69	100.0	100.0	23,903	100.0	100.0	100.0

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Non-MSA							
Refinance Loans							
Low	0	0.0	6.6	0	0.0	3.8	19.2
Moderate	2	15.4	13.3	70	4.8	6.4	18.2
Middle	4	30.8	20.8	451	30.7	13.2	24.0
Upper	5	38.5	38.5	700	47.6	47.4	38.6
Unknown	2	15.4	20.8	250	17.0	29.3	0.0
Total	13	100.0	100.0	1,471	100.0	100.0	100.0
Home Improvement Loans							
Low	1	4.2	5.1	90	2.9	2.0	19.2
Moderate	1	4.2	6.3	90	2.9	2.5	18.2
Middle	4	16.7	19.3	620	20.2	11.2	24.0
Upper	17	70.8	59.7	2,187	71.4	58.7	38.6
Unknown	1	4.2	9.7	75	2.4	25.6	0.0
Total	24	100.0	100.0	3,062	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	4	3.4	3.7	375	1.3	1.4	19.2
Moderate	9	7.8	11.1	1,019	3.5	4.5	18.2
Middle	30	25.9	20.3	6,415	21.8	11.6	24.0
Upper	67	57.8	46.5	19,252	65.3	53.8	38.6
Unknown	6	5.2	18.4	2,419	8.2	28.7	0.0
Total	116	100.0	100.0	29,480	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Non-MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	4.3	0	0.0	3.1	19.2
Moderate	0	0.0	12.9	0	0.0	2.3	18.2
Middle	0	0.0	23.7	0	0.0	6.4	24.0
Upper	8	100.0	57.0	608	100.0	87.0	38.6
Unknown	0	0.0	2.2	0	0.0	1.2	0.0
Total	8	100.0	100.0	608	100.0	100.0	100.0

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Non-MSA							
Other Purpose Closed/Exempt							
Low	0	0.0	4.6	0	0.0	0.6	19.2
Moderate	1	50.0	12.8	156	35.8	2.5	18.2
Middle	0	0.0	22.0	0	0.0	6.2	24.0
Upper	1	50.0	56.9	280	64.2	82.1	38.6
Unknown	0	0.0	3.7	0	0.0	8.6	0.0
Total	2	100.0	100.0	436	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	19.2
Moderate	0	0.0	0.0	0	0.0	0.0	18.2
Middle	0	0.0	0.0	0	0.0	0.0	24.0
Upper	0	0.0	33.3	0	0.0	25.4	38.6
Unknown	0	0.0	66.7	0	0.0	74.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: Non-MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	17	2.5	1.7	2,364	1.0	0.5	4	0.9	1.4	630	0.4	0.4	15.9
Moderate	109	15.9	9.0	22,909	9.6	3.9	59	13.3	8.3	11,414	7.3	3.1	17.3
Middle	160	23.4	18.5	47,184	19.8	11.0	124	28.0	18.3	37,798	24.2	9.9	20.9
Upper	369	53.9	54.5	155,902	65.6	60.2	238	53.7	51.6	100,428	64.4	53.5	45.9
Unknown	30	4.4	16.3	9,419	4.0	24.4	18	4.1	20.3	5,628	3.6	33.2	0.0
Total	685	100.0	100.0	237,778	100.0	100.0	443	100.0	100.0	155,898	100.0	100.0	100.0
Refinance Loans													
Low	12	6.7	6.7	1,840	3.9	2.9	1	1.5	5.6	55	0.4	1.9	15.9
Moderate	38	21.3	15.3	6,919	14.8	7.0	7	10.6	13.6	781	5.9	5.7	17.3
Middle	51	28.7	21.2	12,903	27.6	12.3	23	34.8	21.7	4,153	31.4	10.5	20.9
Upper	71	39.9	41.4	23,456	50.3	48.6	29	43.9	41.2	7,106	53.7	38.8	45.9
Unknown	6	3.4	15.5	1,560	3.3	29.1	6	9.1	17.8	1,134	8.6	43.1	0.0
Total	178	100.0	100.0	46,678	100.0	100.0	66	100.0	100.0	13,229	100.0	100.0	100.0

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 1 of 2
Assessment Area: Non-MSA

Home Improvement Loans													
Low	4	2.1	3.5	54	0.3	3.3	8	6.3	4.6	393	3.5	2.2	15.9
Moderate	27	13.8	12.5	1,644	9.7	7.1	22	17.2	12.6	1,254	11.3	7.0	17.3
Middle	49	25.1	19.9	3,107	18.3	14.6	28	21.9	20.2	1,728	15.6	12.5	20.9
Upper	104	53.3	59.3	10,974	64.5	68.9	67	52.3	54.2	7,587	68.3	63.1	45.9
Unknown	11	5.6	4.8	1,225	7.2	6.2	3	2.3	8.5	142	1.3	15.2	0.0
Total	195	100.0	100.0	17,004	100.0	100.0	128	100.0	100.0	11,104	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	37	3.3	3.6	4,386	1.4	1.3	14	2.0	2.8	1,128	0.6	0.7	15.9
Moderate	179	16.0	11.2	31,747	10.3	4.5	97	14.1	10.1	14,181	7.7	3.4	17.3
Middle	272	24.3	19.3	64,115	20.8	10.6	189	27.4	19.1	44,664	24.1	9.0	20.9
Upper	580	51.9	51.3	195,198	63.4	58.0	361	52.3	49.5	118,081	63.8	47.4	45.9
Unknown	50	4.5	14.6	12,386	4.0	25.6	29	4.2	18.5	7,049	3.8	39.5	0.0
Total	1,118	100.0	100.0	307,832	100.0	100.0	690	100.0	100.0	185,103	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 2 of 2
Assessment Area: Non-MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	4	7.8	5.5	128	2.6	1.9	1	2.4	5.1	50	1.2	1.5	15.9
Moderate	4	7.8	7.7	245	5.0	1.7	7	16.7	11.1	505	12.3	3.3	17.3
Middle	9	17.6	16.3	473	9.6	5.1	11	26.2	18.4	780	19.0	4.3	20.9
Upper	32	62.7	64.2	3,919	79.7	71.8	22	52.4	52.2	2,686	65.6	28.0	45.9
Unknown	2	3.9	6.2	150	3.1	19.4	1	2.4	13.3	75	1.8	62.9	0.0
Total	51	100.0	100.0	4,915	100.0	100.0	42	100.0	100.0	4,096	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.7	0	0.0	0.3	0	0.0	4.3	0	0.0	0.2	15.9
Moderate	1	11.1	8.7	30	2.1	0.6	2	18.2	13.9	227	29.3	1.0	17.3
Middle	3	33.3	16.7	448	30.7	2.2	3	27.3	19.1	205	26.4	1.5	20.9
Upper	4	44.4	64.0	947	65.0	69.8	5	45.5	46.1	274	35.3	27.3	45.9
Unknown	1	11.1	8.0	32	2.2	27.1	1	9.1	16.5	70	9.0	70.0	0.0
Total	9	100.0	100.0	1,457	100.0	100.0	11	100.0	100.0	776	100.0	100.0	100.0

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: Non-MSA													
Purpose Not Applicable													
Low	0	0.0	3.0	0	0.0	1.5	0	0.0	0.0	0	0.0	0.0	15.9
Moderate	0	0.0	3.0	0	0.0	2.6	0	0.0	0.0	0	0.0	0.0	17.3
Middle	0	0.0	3.0	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	20.9
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	45.9
Unknown	0	0.0	90.9	0	0.0	94.1	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Non-MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	30	76.9	51.7	2,962	61.7	34.6	93.0
Over $1 Million	9	23.1		1,839	38.3		5.7
Revenue Unknown	0	0.0		0	0.0		1.3
Total	39	100.0		4,801	100.0		100.0
By Loan Size							
$100,000 or Less	26	66.7	94.9	948	19.7	47.3	
$100,001 - $250,000	6	15.4	3.1	1,160	24.2	17.3	
$250,001 - $1 Million	7	17.9	2.1	2,693	56.1	35.4	
Total	39	100.0	100.0	4,801	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	22	73.3		730	24.6		
$100,001 - $250,000	4	13.3		760	25.7		
$250,001 - $1 Million	4	13.3		1,472	49.7		
Total	30	100.0		2,962	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: Non-MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	2.0	0	0.0	0.7	1.4
Moderate	9	13.0	11.3	2,925	12.2	7.0	12.9
Middle	56	81.2	76.8	18,655	78.0	83.8	72.9
Upper	4	5.8	9.9	2,323	9.7	8.5	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	69	100.0	100.0	23,903	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.3	0	0.0	1.2	1.4
Moderate	0	0.0	10.8	0	0.0	7.4	12.9
Middle	11	84.6	75.1	1,195	81.2	81.7	72.9
Upper	2	15.4	11.8	276	18.8	9.6	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	1,471	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.6	0	0.0	0.4	1.4
Moderate	2	8.3	11.9	123	4.0	7.7	12.9
Middle	20	83.3	79.5	2,784	90.9	86.7	72.9
Upper	2	8.3	8.0	155	5.1	5.3	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	3,062	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	17.1
Moderate	0	0.0	33.3	0	0.0	88.4	16.5
Middle	1	100.0	66.7	125	100.0	11.6	55.5
Upper	0	0.0	0.0	0	0.0	0.0	10.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	125	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	1.8	0	0.0	0.8	1.4
Moderate	11	9.4	11.3	3,048	10.3	7.5	12.9
Middle	96	82.1	76.4	23,603	79.7	83.4	72.9
Upper	10	8.5	10.4	2,954	10.0	8.4	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Non-MSA

Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	117	100.0	100.0	29,605	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Non-MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	1.4
Moderate	0	0.0	14.0	0	0.0	3.7	12.9
Middle	6	75.0	74.2	408	67.1	93.6	72.9
Upper	2	25.0	11.8	200	32.9	2.6	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	608	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.9	0	0.0	0.1	1.4
Moderate	0	0.0	11.0	0	0.0	3.8	12.9
Middle	2	100.0	75.2	436	100.0	89.1	72.9
Upper	0	0.0	12.8	0	0.0	7.0	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	436	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	1.4
Moderate	0	0.0	0.0	0	0.0	0.0	12.9
Middle	0	0.0	100.0	0	0.0	100.0	72.9
Upper	0	0.0	0.0	0	0.0	0.0	12.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Non-MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	6	0.9	0.7	632	0.3	0.2	3	0.7	0.7	601	0.4	0.2	0.5
Moderate	28	4.1	7.8	7,804	3.3	4.7	26	5.9	8.1	8,653	5.6	4.7	8.8
Middle	374	54.6	50.2	126,075	53.0	47.1	226	51.0	49.7	74,711	47.9	49.4	49.7
Upper	277	40.4	41.3	103,267	43.4	48.0	188	42.4	41.5	71,933	46.1	45.7	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	685	100.0	100.0	237,778	100.0	100.0	443	100.0	100.0	155,898	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.6	0	0.0	0.2	2	3.0	0.9	490	3.7	0.3	0.5
Moderate	3	1.7	7.5	1,463	3.1	4.1	2	3.0	8.5	287	2.2	3.9	8.8
Middle	94	52.8	48.2	21,273	45.6	48.6	28	42.4	50.7	6,216	47.0	58.4	49.7
Upper	81	45.5	43.7	23,942	51.3	47.0	34	51.5	40.0	6,236	47.1	37.3	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	178	100.0	100.0	46,678	100.0	100.0	66	100.0	100.0	13,229	100.0	100.0	100.0
Home Improvement Loans													
Low	1	0.5	0.4	30	0.2	0.1	1	0.8	0.5	70	0.6	0.2	0.5
Moderate	7	3.6	5.5	407	2.4	3.5	4	3.1	7.6	406	3.7	5.9	8.8
Middle	91	46.7	41.7	7,598	44.7	37.1	63	49.2	42.5	4,892	44.1	40.2	49.7
Upper	96	49.2	52.3	8,969	52.7	59.2	60	46.9	49.5	5,736	51.7	53.7	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	195	100.0	100.0	17,004	100.0	100.0	128	100.0	100.0	11,104	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	2.4	0	0.0	0.5	0	0.0	3.2	0	0.0	0.3	4.6
Moderate	0	0.0	7.1	0	0.0	0.6	0	0.0	6.5	0	0.0	3.7	21.6
Middle	4	44.4	38.1	2,903	12.7	25.7	2	33.3	25.8	2,021	38.9	18.3	37.6
Upper	5	55.6	52.4	19,973	87.3	73.2	4	66.7	64.5	3,176	61.1	77.7	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	22,876	100.0	100.0	6	100.0	100.0	5,197	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	7	0.6	0.6	662	0.2	0.2	6	0.9	0.7	1,161	0.6	0.2	0.5
Moderate	39	3.5	7.4	9,824	3.0	4.0	33	4.7	7.9	9,446	5.0	4.1	8.8
Middle	593	52.6	48.2	160,904	48.7	48.0	348	50.0	48.9	90,256	47.4	53.2	49.7
Upper	488	43.3	43.7	159,318	48.2	47.8	309	44.4	42.4	89,437	47.0	42.4	41.0

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 1 of 2
Assessment Area: Non-MSA

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,127	100.0	100.0	330,708	100.0	100.0	696	100.0	100.0	190,300	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography – Table 2 of 2
Assessment Area: Non-MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.1	0.5
Moderate	1	2.0	7.3	150	3.1	3.1	1	2.4	6.0	100	2.4	2.2	8.8
Middle	26	51.0	42.8	1,967	40.0	60.5	24	57.1	44.3	2,091	51.0	70.4	49.7
Upper	24	47.1	49.9	2,798	56.9	36.4	17	40.5	49.1	1,905	46.5	27.3	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	4,915	100.0	100.0	42	100.0	100.0	4,096	100.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.4	0	0.0	0.0	0	0.0	1.3	0	0.0	0.1	0.5
Moderate	0	0.0	5.3	0	0.0	0.6	0	0.0	6.5	0	0.0	0.9	8.8
Middle	4	44.4	43.9	1,088	74.7	62.6	5	45.5	52.2	325	41.9	85.1	49.7
Upper	5	55.6	50.4	369	25.3	36.8	6	54.5	40.0	451	58.1	14.0	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	1,457	100.0	100.0	11	100.0	100.0	776	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.0	0	0.0	1.3	0	0.0	0.0	0	0.0	0.0	0.5
Moderate	0	0.0	9.1	0	0.0	8.4	0	0.0	3.8	0	0.0	0.1	8.8
Middle	0	0.0	48.5	0	0.0	32.3	0	0.0	61.5	0	0.0	78.6	49.7
Upper	0	0.0	39.4	0	0.0	58.0	0	0.0	34.6	0	0.0	21.3	41.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Small Business Lending By Income Level of Geography Non-MSA AA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.5	0	0.0	2.2	5.7
Moderate	1	2.6	15.8	20	0.4	11.9	13.1
Middle	36	92.3	69.7	4,301	89.6	72.4	70.1
Upper	2	5.1	10.0	480	10.0	13.3	11.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	0.3	
Total	39	100.0	100.0	4,801	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Non-MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	3.4	485	1.9	244	50.3	4,861	19.2
Moderate	4	13.8	3,547	14.0	486	13.7	4,597	18.2
Middle	21	72.4	18,320	72.5	1,247	6.8	6,079	24.0
Upper	3	10.3	2,934	11.6	224	7.6	9,749	38.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**29**	**100.0**	**25,286**	**100.0**	**2,201**	**8.7**	**25,286**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,615	429	1.4	26.6	886	54.9	300	18.6
Moderate	7,314	3,861	12.9	52.8	2,655	36.3	798	10.9
Middle	35,490	21,760	72.9	61.3	6,534	18.4	7,196	20.3
Upper	4,953	3,785	12.7	76.4	715	14.4	453	9.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**49,372**	**29,835**	**100.0**	**60.4**	**10,790**	**21.9**	**8,747**	**17.7**

2024 Non-MSA AA Demographics								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	273	5.7	246	5.5	25	9.2	2	3.1
Moderate	627	13.1	579	13.0	37	13.6	11	17.2
Middle	3,353	70.1	3,142	70.6	172	63.2	39	60.9
Upper	531	11.1	481	10.8	38	14.0	12	18.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4,784**	**100.0**	**4,448**	**100.0**	**272**	**100.0**	**64**	**100.0**
Percentage of Total Businesses:				**93.0**		**5.7**		**1.3**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	22	6.1	20	5.6	2	50.0	0	0.0
Middle	308	85.3	306	85.7	2	50.0	0	0.0
Upper	31	8.6	31	8.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**361**	**100.0**	**357**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Rosebud County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	403	18.6
Moderate	0	0.0	0	0.0	0	0.0	414	19.1
Middle	3	75.0	1,562	72.2	216	13.8	444	20.5
Upper	1	25.0	602	27.8	21	3.5	903	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**4**	**100.0**	**2,164**	**100.0**	**237**	**11.0**	**2,164**	**100.0**

2024 Rosebud County AA Demographics									
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	3,052	1,404	64.2	46.0	897	29.4	751	24.6	
Upper	1,097	783	35.8	71.4	153	13.9	161	14.7	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	**4,149**	**2,187**	**100.0**	**52.7**	**1,050**	**25.3**	**912**	**22.0**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	190	75.4	165	73.7	18	90.0	7	87.5	
Upper	62	24.6	59	26.3	2	10.0	1	12.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**252**	**100.0**	**224**	**100.0**	**20**	**100.0**	**8**	**100.0**	
Percentage of Total Businesses:				**88.9**		**7.9**		**3.2**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	60	96.8	60	96.8	0	0.0	0	0.0	
Upper	2	3.2	2	3.2	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	**62**	**100.0**	**62**	**100.0**	**0**	**0.0**	**0**	**0.0**	
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**	

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 1 of 2 Assessment Area: South Central Non-MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	2.3	0.8	130	0.8	0.3	13.5
Moderate	4	9.3	6.6	557	3.5	3.1	20.0
Middle	14	32.6	14.5	4,434	27.9	9.2	20.3
Upper	24	55.8	58.7	10,788	67.8	68.1	46.2
Unknown	0	0.0	19.4	0	0.0	19.3	0.0
Total	43	100.0	100.0	15,909	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	4.0	0	0.0	3.7	13.5
Moderate	2	40.0	16.0	325	30.5	9.6	20.0
Middle	0	0.0	17.0	0	0.0	13.4	20.3
Upper	3	60.0	39.0	740	69.5	45.5	46.2
Unknown	0	0.0	24.0	0	0.0	27.8	0.0
Total	5	100.0	100.0	1,065	100.0	100.0	100.0
Home Improvement Loans							
Low	1	7.1	5.3	20	1.3	1.3	13.5
Moderate	3	21.4	13.2	445	29.4	17.4	20.0
Middle	2	14.3	13.2	314	20.7	12.3	20.3
Upper	8	57.1	55.3	735	48.5	46.9	46.2
Unknown	0	0.0	13.2	0	0.0	22.1	0.0
Total	14	100.0	100.0	1,514	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	3	4.6	2.7	160	0.8	1.2	13.5
Moderate	9	13.8	9.7	1,327	7.0	5.0	20.0
Middle	17	26.2	15.6	4,803	25.4	10.5	20.3
Upper	36	55.4	52.8	12,623	66.7	62.5	46.2
Unknown	0	0.0	19.2	0	0.0	20.8	0.0
Total	65	100.0	100.0	18,913	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2024 Home Mortgage Lending By Borrower Income Level – Table 2 of 2 Assessment Area: South Central Non-MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	9.1	0	0.0	17.2	13.5
Moderate	0	0.0	0.0	0	0.0	0.0	20.0
Middle	1	100.0	27.3	55	100.0	27.0	20.3
Upper	0	0.0	45.5	0	0.0	44.9	46.2
Unknown	0	0.0	18.2	0	0.0	10.8	0.0
Total	1	100.0	100.0	55	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	1	50.0	10.0	10	2.7	1.1	13.5
Moderate	0	0.0	15.0	0	0.0	5.1	20.0
Middle	0	0.0	20.0	0	0.0	16.5	20.3
Upper	1	50.0	50.0	360	97.3	75.9	46.2
Unknown	0	0.0	5.0	0	0.0	1.4	0.0
Total	2	100.0	100.0	370	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	13.5
Moderate	0	0.0	0.0	0	0.0	0.0	20.0
Middle	0	0.0	0.0	0	0.0	0.0	20.3
Upper	0	0.0	0.0	0	0.0	0.0	46.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: South Central Non-MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	32	74.4	75.6	11,582	72.8	67.4	74.7
Upper	11	25.6	24.4	4,327	27.2	32.6	25.3

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 1 of 2 Assessment Area: South Central Non-MSA							
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	15,909	100.0	100.0	100.0
			Refinance Loans				
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	60.0	59.0	740	69.5	62.2	74.7
Upper	2	40.0	41.0	325	30.5	37.8	25.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,065	100.0	100.0	100.0
			Home Improvement Loans				
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	78.6	76.3	1,154	76.2	71.1	74.7
Upper	3	21.4	23.7	360	23.8	28.9	25.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,514	100.0	100.0	100.0
			Multifamily Loans				**Multi-family Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	100.0	2,615	100.0	100.0	99.3
Upper	0	0.0	0.0	0	0.0	0.0	0.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,615	100.0	100.0	100.0
			Total Home Mortgage Loans				**Owner Occupied Units %**
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	50	74.6	70.6	16,461	76.5	66.9	74.7
Upper	17	25.4	29.2	5,067	23.5	33.0	25.3
Unknown	0	0.0	0.2	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	67	100.0	100.0	21,528	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2024 Home Mortgage Lending By Income Level of Geography – Table 2 of 2 Assessment Area: South Central Non-MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	63.6	0	0.0	65.8	74.7
Upper	1	100.0	36.4	55	100.0	34.2	25.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	55	100.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	55.0	370	100.0	56.7	74.7
Upper	0	0.0	40.0	0	0.0	39.2	25.3
Unknown	0	0.0	5.0	0	0.0	4.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	370	100.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	74.7
Upper	0	0.0	0.0	0	0.0	0.0	25.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	0.0	0	0.0	0.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 South Central Non-MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	761	13.5
Moderate	0	0.0	0	0.0	0	0.0	1,125	20.0
Middle	5	71.4	4,071	72.4	194	4.8	1,141	20.3
Upper	1	14.3	1,554	27.6	74	4.8	2,598	46.2
Unknown	1	14.3	0	0.0	0	0.0	0	0.0

2024 South Central Non-MSA AA Demographics								
Total AA	**7**	**100.0**	**5,625**	**100.0**	**268**	**4.8**	**5,625**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	8,943	4,919	74.7	55.0	2,485	27.8	1,539	17.2
Upper	2,827	1,665	25.3	58.9	407	14.4	755	26.7
Unknown	10	0	0.0	0.0	0	0.0	10	100.0
Total AA	**11,780**	**6,584**	**100.0**	**55.9**	**2,892**	**24.6**	**2,304**	**19.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,209	82.1	1,145	82.1	50	83.3	14	82.4
Upper	262	17.8	250	17.9	9	15.0	3	17.6
Unknown	1	0.1	0	0.0	1	1.7	0	0.0
Total AA	**1,472**	**100.0**	**1,395**	**100.0**	**60**	**100.0**	**17**	**100.0**
Percentage of Total Businesses:				**94.8**		**4.1**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	129	74.6	129	74.6	0	0.0	0	0.0
Upper	44	25.4	44	25.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**173**	**100.0**	**173**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

2024 Teton County AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	241	15.2
Moderate	0	0.0	0	0.0	0	0.0	263	16.6
Middle	3	100.0	1,582	100.0	100	6.3	493	31.2
Upper	0	0.0	0	0.0	0	0.0	585	37.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**3**	**100.0**	**1,582**	**100.0**	**100**	**6.3**	**1,582**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,924	1,798	100.0	61.5	698	23.9	428	14.6
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**2,924**	**1,798**	**100.0**	**61.5**	**698**	**23.9**	**428**	**14.6**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	377	100.0	346	100.0	21	100.0	10	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**377**	**100.0**	**346**	**100.0**	**21**	**100.0**	**10**	**100.0**
Percentage of Total Businesses:				**91.8**		**5.6**		**2.7**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	159	100.0	158	100.0	1	100.0	0	0.0

2024 Teton County AA Demographics								
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**159**	**100.0**	**158**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**99.4**		**0.6**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.